



BY EMAIL and RESS

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Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
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October 28, 2019
Our File: EB20190242

Attn: Christine Long, Registrar & Board Secretary

Dear Ms. Long:

Re: EB-2019-0242 – AMPCO Market Rules Review – SEC Interrogatories to AMPCO & IESO

We are counsel to the School Energy Coalition (“SEC”). Attached, please find a copy of SEC’s interrogatories to both the Association of Major Power Consumers in Ontario (“AMPCO”) and the Independent Electricity System Operator (“IESO”)

Yours very truly,
Shepherd Rubenstein P.C.

Original signed by

Mark Rubenstein

cc: Wayne McNally, SEC (by email)
Applicant, IESO, and intervenors (by email)

ONTARIO ENERGY BOARD

Association of Major Power Consumers in Ontario

**Application to Review Amendments to the Market Rules
made by the Independent Electricity System Operator**

INTERROGATORIES

ON BEHALF OF THE

SCHOOL ENERGY COALITION

Interrogatories to AMPCO

1. [Notice of Appeal, para. 24, 51] AMPCO states that the Market Rules amendments at issue are “inimical” and “contrary” to many of the objectives of the [Electricity Act] including 1(f). Please explain how AMPCO believes the Market Rules amendments at issue are inconsistent with the objective “to protect the interests of consumers with respect to prices and the adequacy, reliability and quality of electricity service”
2. [Notice of Appeal, para. 36-45] AMPCO relies on FERC Order No. 745. Please provide details regarding any material differences in the market structure of the Ontario versus that which FERC regulates, and how transferable the analysis contained in FERC Order No. 745 is to the Ontario market.
3. SEC wishes to better understand the impact on ratepayers of the Market Rules amendments at issue, and AMPCO’s position that Demand Response providers should be eligible for energy payment. Please provide AMPCO’s views, including copies of any analysis that it has undertaken or is aware of, regarding impact on costs that will ultimately be borne by Ontario ratepayers of providing energy payments to Demand Response providers.
4. [Market Surveillance Panel, *Monitoring Report on the IESO-Administered Electricity Markets* Report (March 2019) <https://www.oeb.ca/sites/default/files/msp-monitoring-report-20190429.pdf>] In the Market Surveillance Panel’s March 2019 *Monitoring Report on the IESO-Administered Electricity Markets* report, it made a number of critical comments in the IESO’s Demand Response Auction in which the Transitional Capacity Auction is replacing. Please explain what impact, if any, AMPCO believes that providing energy payments to Demand Response providers have on the criticisms made by the Market Surveillance Panel.

Interrogatories to the IESO

1. SEC wishes to better understand the impact on ratepayers of the Market Rules amendments at issue, and AMPCO's position that Demand Response providers should be eligible for energy payment, Please provide the IESO's views, including a copy of all analysis that is has undertaken or is aware of, regarding impact on costs that will ultimately be borne by Ontario ratepayers of providing energy payments to Demand Response providers.
2. Please provide a copy of all analysis that IESO has in possession regarding potential energy payments to Demand Response providers.
3. [Market Surveillance Panel, *Monitoring Report on the IESO-Administered Electricity Markets Report* (March 2019) <https://www.oeb.ca/sites/default/files/msp-monitoring-report-20190429.pdf>] In the Market Surveillance Panel's March 2019 *Monitoring Report on the IESO-Administered Electricity Markets* report, it made a number of critical comments in the IESO's Demand Response Auction in which the Transitional Capacity Auction is replacing. Please explain what impact, if any, IESO believes that providing energy payments to Demand Response providers have on the criticisms made by the Market Surveillance Panel.
4. [Notice of Appeal, para. 36-45] AMPCO relies on FERC Order No. 745. Please provide the IESO's view on the material differences in the market structure of the Ontario versus that which FERC regulates, and how transferable the analysis contained in FERC Order No. 745 is to the Ontario market.
5. [Notice of Appeal, para. 36-45] FERC Order No. 745 outlines a Net Benefits Test. Please explain how the FERC Order No. 745 Net Benefits Test could be applied in Ontario.
6. How are TCA availability payments recovered from ratepayers?

Respectfully submitted on behalf of the School Energy Coalition this October 28, 2019.

Original signed by

Mark Rubenstein
Counsel for the School Energy Coalition