



**BY EMAIL and RESS**

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Ontario Energy Board  
2300 Yonge Street  
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Toronto, Ontario  
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November 13, 2019  
Our File: EB20190242

**Attn: Christine Long, Registrar & Board Secretary**

Dear Ms. Long:

**Re: EB-2019-0242 – AMPCO Market Rules Review – SEC Interrogatories**

We are counsel to the School Energy Coalition (“SEC”). Attached, please find a copy of SEC’s interrogatories to the Independent Electricity System Operator, Kingston CoGen Limited Partnership, and Ontario Energy Board Staff.

Yours very truly,  
**Shepherd Rubenstein P.C.**

*Original signed by*

Mark Rubenstein

cc: Wayne McNally, SEC (by email)  
Applicant, IESO, Kingston CoGen, OEB Staff, 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 the IESO**

**SEC-IESO-7**

[para. 1] Is there a forecast capacity gap before the summer of 2023? If so, please provide details

**SEC-IESO-8**

[para. 14] Did the IESO undertake a business case or similar analysis created for the TCA? If so, please provide a copy.

**SEC-IESO-9**

SEC understands that the IESO plans to amend the market rules between now and 2023 to allow for other resources to take part in the TCA. With the exception of the necessary amendments for that purpose, what other market rules amendments does the IESO believe will be required before it undertakes the auction to fulfill the 2023 forecast capacity gap?

**SEC-IESO-10**

Do the Market Rules require the IESO to undertake the TCA (or previous DR Auction), or do they simply provide the option for the IESO to decide to undertake the TCA (or previous DR Auction)?

**SEC-IESO-11**

[para. 77] Using the most recent DR Auction clearance price as a proxy the TCA auction clearance prices, please provide an estimate of the total amount expected to be paid through the TCA.

**SEC-IESO-12**

[para. 92(b)] The IESO has provided its view on its expectation regarding the frequency of economic activation of DR resources. On a comparative basis, what is its view on the forecast quantity of energy that the generators who have capacity obligations as a result of the TCA will produce.

**SEC-IESO-13**

[para. 107] Please provide an example of the situation that Navigant was alluding to regarding more DR activations may not reduce costs to customers due to the Global Adjustments.

**SEC-IESO-14**

[KingstonCoGen, Evidence of Brian Rivard, para. 73] Please provide the IESO's views on the information that Mr. Rivard says is required for the IESO to develop a net benefits test.

**Interrogatories to Kingston CoGen Limited Partnership**

**SEC-KingstonCoGen-1**

[para. 66-71] Mr. Rivard's evidence is that it expects that the net benefits test would rarely, if every, be satisfied in Ontario, based on recent historical information provided by the IESO. Please provide Mr. Rivard's view on how often it expects the net benefits test would be satisfied when the IESO forecast capacity gap occurs in 2023.

**SEC-KingstonCoGen-2**

[para 83-85] Please provide the applicability of the critiques of FERC Order No. 745 referenced in the various papers to the Ontario-specific context.

**Interrogatories to OEB Staff**

**SEC-OEBStaff-1**

[KingstonCoGen, Evidence of Brian Rivard, para. 53-85] Please provide LEI's views on Mr. Rivard's evidence regarding the application of FERC Order No. 745 to Ontario.

Respectfully submitted on behalf of the School Energy Coalition this November 13, 2019.

*Original signed by*

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Mark Rubenstein  
Counsel for the School Energy Coalition