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Reference No. 203019/20

December 12, 2024

**VIA E-MAIL AND RESS**

Ms. Nancy Marconi  
Registrar  
Ontario Energy Board  
P.O. Box 2319  
26<sup>th</sup> Floor, 2300 Yonge Street  
Toronto, ON M4P 1E4

**RE: Capital Power Corporation, Thorold CoGen L.P., Portlands Energy Centre L.P. dba Atura Power, St. Clair Power L.P., TransAlta (SC) L.P. (the “NQS Generation Group”) Application for Review of Amendments to the Independent Electricity System Operator (“IESO”) Market Rules - EB-2024-0331 (“Application”)**

Dear Ms. Marconi:

We write on behalf of intervener FirstLight.

The OEB's Decision and Procedural Order No. 2 in this proceeding required the IESO's Market Rule Description Evidence to address in part:

“the request made by FirstLight “with respect to what negative<sup>[1]</sup> pricing will look like under the Retail Settlement Code”, as part of the description of the expected impacts resulting from the market rule amendments”.<sup>2</sup>

The IESO's Market Rule Description Evidence, filed yesterday December 11, 2024, fails to comply with this requirement.

More particularly, subsection 2.4.3 of the IESO's Market Rule Description Evidence fails to describe how the Amendments will impact negative pricing for distribution connected suppliers that are settled under the OEB's Retail Settlement Code.

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<sup>1</sup> FirstLight Letter with requested corrections to transcript, November 28, 2024, online:

<<https://www.rds.oeb.ca/CMWebDrawer/Record/873644/File/document>>.

<sup>2</sup> Decision and Procedural Order No. 2, December 2, 2024, page 11, online: ,

<https://www.rds.oeb.ca/CMWebDrawer/Record/874148/File/document>>.

1374-4494-3633.1



FirstLight accordingly requests the OEB direct the IESO to promptly file such evidence.

Thank you,

Reena Goyal  
Counsel

RG/cdc

c: Stephen Somerville, FirstLight  
All parties