

NQS GENERATION GROUP
IESO MARKET RULE AMENDMENT

EB-2024-0331

Technical Conference – January 9 – 10, 2025

Exhibit List

| Exhibits | Description |
|-----------------|---|
| K | Day 1 – January 9, 2025 |
| | |
| K1.1 | GLOSSARY OF TERMS |
| K1.2 | NQS CROSS-EXAMINATION COMPENDIUM FOR IESO PANEL 1 |
| K | Day 2 – January 10, 2025 |
| | |
| | NO EXHIBITS WERE FILED ON DAY 2 |

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Undertaking List

| J | Undertakings | Responses Filed Date |
|-------------|--|---------------------------------|
| | Day 1 – JANUARY 9, 2025 | |
| J1.1 | IESO TO PRODUCE THE DATA AND ANALYSIS USED TO SUPPORT ITS MARKET PARTICIPANT DATA CALCULATIONS, TOGETHER WITH ANY EXPLANATIONS (UNDER ADVISEMENT) | |
| J1.2 | IESO TO CONFIRM THAT THE 1,300 HISTORICAL RESOURCE COMMITMENTS WERE WITHIN THE NQS GROUP (UNDER ADVISEMENT) | |
| J1.3 | IESO TO CREATE AND PRODUCE A CHART IDENTIFYING THE MARKET SURVEILLANCE PANEL AND AUDITOR GENERAL OF ONTARIO CRITIQUES AS IT RELATES TO THE REAL-TIME GENERATOR COST GUARANTEE PROGRAM, THE DATE OF THOSE CRITIQUES, TOGETHER WITH THE STEPS THE IESO TOOK TO ADDRESS THOSE CRITIQUES AND THE DATE THAT THOSE STEPS WERE IMPLEMENTED TO ADDRESS THOSE CRITIQUES (REFUSED) | |
| J1.4 | IESO TO PROVIDE ANY INFORMATION OR DATA ON THE NUMBER OF NQS GENERATORS THAT CURRENTLY PARTICIPATE IN THE DAY-AHEAD COMMITMENT PROCESS ON AN INCREMENTAL-ENERGY-OFFER-ONLY BASIS, WITHOUT RELIANCE ON THE GENERATOR COST GUARANTEE PROGRAM (REFUSED) | |
| J1.5 | IESO TO CONSOLIDATE THE INFORMATION IT CONSIDERED INTO EVIDENCE IN THE PROCEEDING THAT WOULD SUPPORT ITS CONCLUSION AND ASSERTION (UNDER ADVISEMENT) | |
| J1.6 | IESO TO CONDUCT A VALIDATION PROCESS RE CMSC | |
| J1.7 | IESO TO PROVIDE THE DOLLAR AMOUNT OF EX-ANTE MITIGATION OR EX-POST SETTLEMENT ADJUSTMENTS | |

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|---------------------------------|--|-------------------------|
| | UNDER THE DAY-AHEAD COMMITMENT PROCESS, UNDER THE CURRENT MARKET POWER MITIGATION REGIME FOR THE 2018 TO 2023 TIME FRAME (REFUSED) | |
| J1.8 | IESO TO PROVIDE A LIST OF MR. MATSUGU'S PRESENTATIONS, GUEST LECTURES, OR JOURNAL ARTICLES RELEVANT TO MATTERS IN THE PROCEEDING (UNDER ADVISEMENT) | |
| J1.9 | IESO TO PROVIDE A LIST AND CAPACITY OF THE NATURAL GAS GENERATION FACILITIES THAT ARE NON-QUICK START AND ARE NOT PART OF THE NQS GROUP | |
| J1.10 | IESO TO FILE THE FILINGS REQUIRED UNDER SECTION 6.25 OF THE IESO'S LICENCE, SINCE THE FIRST MSP RECOMMENDATIONS, RELATED TO THE ISSUES ADDRESSED BY THE MARKET RENEWAL PROGRAM AND THE MRP AMENDMENTS | |
| J1.11 | IESO TO PROVIDE ITS POSITION ON WHETHER THE MRP AMENDMENTS DISCRIMINATE AGAINST THE NQS GENERATORS, BUT THAT DISCRIMINATION IS JUST; OR THAT THE MRP AMENDMENTS DO NOT DISCRIMINATE AGAIN THE NQS GENERATORS; USING "DISCRIMINATE" IN THE SENSE OF "ECONOMIC DISCRIMINATION", AS DEFINED BY THE OEB (UNDER ADVISEMENT) | |
| J1.12 | IESO TO FILE THE BUSINESS CASE VALIDATION MEMO | |
| DAY 2 – JANUARY 10, 2025 | | |
| J2.1 | NQS TO PRODUCE THE RETAINER LETTER OF MR. CHEE-ALOY | |
| J2.2 | A) NQS GROUP TO CONFIRM WHETHER THE TEAM MET WITH THE IESO AND MAKE PRESENTATIONS TO THE IESO THAT ARE ALSO COVERED IN YOUR INDEPENDENT EXPERT REPORT IN THIS CASE (REFUSED); (B) NQS GROUP TO CONFIRM WHETHER WITNESSES CONTINUE TO BE ENGAGED BY SOME OR ALL OF THE APPLICANTS IN RESPECT OF CONTRACT AMENDMENT NEGOTIATIONS WITH THE IESO (REFUSED) | |

| J | Undertakings | Responses Filed Date |
|-------------|--|-------------------------|
| J2.3 | NQS TO FILE REFERENCES TO PRE-DISPATCH AND REAL-TIME TABLES FROM MARKET SURVEILLANCE PANEL REPORTS | |
| J2.4 | NQS TO CONFIRM WHETHER THE YORK ENERGY CENTRE AND THE EAST WINDSOR COGENERATION FACILITY EARN RT-GCG REVENUES | |
| J2.5 | NQS TO FILE A LIVE EXCEL VERSION SHOWING THE CALCULATIONS OF THE DATA IN FIGURES 19, 20, and 22 IN THE POWER ADVISORY REPORT (REFUSED) | |
| J2.6 | NQS TO ASK POWER ADVISORY TO CONFIRM THE LIST OF FACILITIES IN its REPORT | |