



By email to: rule.amendments@ieso.ca
Independent Electricity System Operator
1600-120 Adelaide Street West
Toronto, ON M5H 1T1

August 31, 2017

Dear Sir/Madam

Re: MR-00431: Market Rules True-Up – Disconnection Orders

The Electricity Distributors Association (EDA) is the voice of Ontario's local electricity distribution sector, which consists of municipally and privately owned local distribution companies (LDCs). The distribution sector delivers electricity to 5 million residential, commercial, industrial and institutional customers throughout the province. The sector employs 10,000 people directly and holds \$19 billion in assets; it has \$1.9 billion in annual capital spending and \$1.6 billion in annual operational spending; and makes hundreds of millions in direct contributions to both municipal and provincial revenues.

The EDA thanks the Independent Electricity System Operator (IESO) for the opportunity to provide comments in the above-named matter. The IESO's Market Rules set out the IESO's powers to disconnect Wholesale Market Participants (WMP) directly connected to the IESO controlled grid but not those embedded within an LDC. The proposed amendment will, upon adoption, result in all market participants being treated consistently. Ontario's LDCs support consistency across the IESO's Market Rules and commend the IESO for addressing this 'gap' in the IESO's powers to disconnect. It is clear that the proposed amendments will capture Ontario's LDCs as a party to IESO ordered disconnections of embedded WMPs.

The amendment to the IESO's Market Rules must be explicit that the LDC is held harmless from any and all consequences when disconnecting an embedded WMP at the IESO's direction and under the authority of its Market Rules.

Please refer any questions or comments on these comments to Kathi Farmer, Senior Regulatory Affairs Advisor at kfarmer@eda-on.ca or 905.265.5333.

Sincerely

Teresa Sarkesian
President and Chief Executive Officer