

TO: Nancy Marconi
Registrar
RE: EB-2024-0300

My first comment concerns the unseemly haste for this consultation, which allows all of 7 days, including a weekend, for comments. IESO was working on a DAM when I was on Board staff, close to twenty years ago. I would have thought that it would have occurred to someone, when the launch deadline was established, that the Board's codes may need amending. *Plus ca change*. The old IEMO seemed to consider the retail "market" an afterthought, so why would IESO be any different? The result at that time was that the retail settlement system failed a few months after "market opening" on May 1, 2001. Assuming there are still foolish people who need to settle with retailers, a similar failure is not at all likely but a little forethought is always appreciated.

The notice mentions that distributors will need to make changes to their CIS and that other unspecified changes will be needed also. More specifically, the EBT Standards, "authorized" by the Board and accepted by the industry, will need to be changed. The xml schemas can probably stay the same but the Implementation Guides will need changes. Good luck convening the EBT Standards Advisory Committee. I am quite available but perhaps the Board would take Mr Hewson as speaking for the industry? [EBT AC 2005.xls](#)



Screenshot
(89).png

I am not pleased to see that the RSC is still full of errors (for example, it still refers to the "IMO"), most particularly the equations in chapter 3, which are mathematical gibberish. While it is being amended for the DAM it would be nice if the Board took the opportunity to provide a clean version but it seems that there may not be enough time. I would be happy to provide a list. Fortunately the distributors know what the correct calculations are. It seems somehow fitting that a make-believe market has been governed by rules that were ignored.

I do not seek cost reimbursement.

Submitted respectfully,

Russ Houldin