



Market Rule Amendment Written Submission

This form is used to provide comment on a *market rule* amendment under consideration by the *IESO*. Please complete all four sections of this form and submit the completed form by email to the following:

Email Address: Rule.Amendments@ieso.ca
Attention: Market Rules Group
Subject: Market Rule Written Submission

All information submitted in this process will be used by the *IESO* solely in support of its obligations under the *Electricity Act, 1998*, the *Ontario Energy Board Act, 1998*, the *Market Rules* and associated policies, standards and procedures and its licence. All submitted information will be assigned the *confidentiality classification* of “Public” upon receipt. You should be aware that the *IESO* intends to *publish* this written submission.

Terms and acronyms used in this Form that are italicized have the meanings ascribed thereto in Chapter 11 of the *Market Rules*.

PART 1 – SUBMITTER’S INFORMATION

Please enter your organization and contact information in full.

Name: David Peterson

(if applicable) *Market Participant / Metering Service Provider* No.¹: 102200

Market Participant Class:
Generator

Telephone: (416) 592-3081

Fax: (416) 592-6405

E-mail Address: David.Peterson@opg.com

PART 2 – MARKET RULE AMENDMENT REFERENCE

Type of Rule Amendment Being Commented on (please indicate with x):

Amendment Submission Proposed Rule Amendment Recommended Rule Amendment

MR Number: MR-00414-R00

This *Market Rule* number is located on the “Current Market Rule Amendment” web page.

Date Relevant Amendment Submission, Proposed or Recommended Rule Amendment Posted for Comment: April 2, 2015

¹ This number is a maximum of 12 characters and does not include any spaces or underscore.

PART 3 – COMMENTS ON RULE AMENDMENT

Provide your comments.

In section 3.5.1G, the IESO should consider using “for any dispatch interval ‘t’” to be consistent with the language in Section 3.5.A.1.

In section 3.5A.1, OP(P,Q,B) is defined "Let OP(P,Q,B) be a function of Price(P), Quantity (Q) and an $n \times 2$ matrix (B) of offered price-quantity pairs". In the same section, it states "Using the terms below, let OP be expressed as $RDC_{k,h}m,t$ calculated as follows:". This appears to re-define OP and is inconsistent with the wording used in the current section 3.5.2 for CMSC. For greater clarity and consistency, the IESO should consider using similar wording as used in section 3.5.2, substituting RDC for CMSC to read, "Using the terms below, let $RDC_{k,h}m,t$ be expressed as follows:"

PART 4 – EXTERNAL CONSULTATION MEETING

If you believe that a special meeting of stakeholders would be necessary/desirable to discuss the issues raised by the rule amendment, please complete the following information:

External Stakeholdering meeting necessary/desirable (please indicate with x):

Reason(s) why you believe a meeting is necessary/desirable: