



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: TransCanada Energy Ltd.

(if applicable) *Market Participant /
Metering Service Provider* No.¹: 104358

Market Participant Class:
Generator

Telephone: 416-869-2180

Fax: 416-869-2114

E-mail Address: margaret_kuntz@transcanada.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-00425 (“RT-GCG MRA”)

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: June 2, 2016

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.

1. TCE is concerned with the amount of details still yet to be determined in the RT-GCG Cost Recovery Market Rule Amendment (RT-GCG MRA) and that the IESO has indicated will be dealt through the market manual process. Given that the details in the manuals can significantly impact the scope and application of the rule(s) it is imperative that market participants be provided the details in the manual(s) in order to sufficiently understand and comment on the proposed RT-GCG MRA. For example, the phrase “*in accordance with the applicable market manual*” in Sections 2.2B.4 and 4.7B.5.1 lacks any details upon which the market participant can provide the IESO with any substantive or productive comments. For this reason TCE believes that more details are required within the proposed RT-GCG MRA before the MRA is recommended for Board approval.
2. With respect to the requirement to provide “any other data” pursuant to Section 2.2B.1.4C, TCE has the following two comments:
 - a. Since the IESO will have implemented pre-approved cost values and methodologies under the RT-GCG program, TCE is unsure as to what “any other data” the IESO may request pursuant to Section 2.2B.1.4C. As such, TCE suggests that Section 2.2B.1.4C include a reasonableness standard with any such request by the IESO (i.e. “...any other data, as *reasonably* requested by the IESO,...”); and
 - b. Section 2.2B.1.4 also provides no reasonable time frame in which the IESO must make its reasonableness determination of such data. TCE is concerned that the IESO’s review and reasonableness determination pursuant to Section 2.2B.1.4 may be unexpectedly or indefinitely delayed depending on resource and staffing constraints or any other reasons that the IESO may face from time to time. Accordingly, TCE strongly suggests the rule include a timeline as to when the IESO is required to determine the “other data” as reasonable. TCE suggests that the IESO make its determination within 10 business days after its receipt of any other data.
3. Additionally, it is also unclear to TCE in Section 2.2B.2 if whether the IESO can subsequently audit the same data provided by the market participant pursuant to Section 2.2B.1.4 which the IESO had previously reviewed and accepted as reasonable in the first instance. If that is the case, TCE requests that the IESO clarify and outline the basis upon which the IESO can revisit the same data that it had previously reviewed and accepted as reasonable. We note that one of the stated objectives of this MRA is to reduce the scope and frequency of audits so the potential for two audits of the same data appears to be contrary to that objective.
4. The current RT-GCG MRA is silent on frequency of review and determination of the pre-approved costs and does not address changes that may happen in the interim. TCE is of the view these details need to be embedded in the RT-GCG MRA.

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):

PART 4 – EXTERNAL CONSULTATION MEETING

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