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Sent: March 22, 2018 12:54 PM
To: Rule Amendments
Cc: Gary Nunes; Robert Hnatejko
Subject: Feedback to Rule Amendment MR-00435: Station Service Obligations

Rodan Energy Solutions supports the proposed rule amendment MR-00435 as per which the IESO proposes to shift the obligation to provide station service estimates from the registered market participant at the facility to the market participant responsible for registering the relevant facility, which is typically the owner-operator of the facility. The owner-operator of the facility has access to the necessary drawings and equipment data and also possesses the necessary access to operational and maintenance records, load factors, etc. all of which aid in calculating station service estimates and performing revisions to it, as necessary. In our experience, the current rule places undue burden on those registered market participants who are not the owner-operators of their respective connection-facilities to provide station service estimates as in most cases they need to rely on the owner to furnish this information.

Regards,

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