



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 or fax to the following:

Email Address: Rule.Amendments@ieso.ca
 Fax No.: (416) 506-2847 **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: John MacKenzie

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

Market Participant Class:
N/A

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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-00364

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: 26 Nov 09

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.

Questions on R04:

- The existing and proposed Appendix 4.15 requires that generators providing regulation need to provide the status of their automatic generation control (AGC) equipment to the IESO. I think there should be equivalent obligation on non-generation resources providing regulation i.e. they must provide the IESO with the status of equipment or system providing the regulation service. I do not see such an obligation in the draft proposal. I think the obligation could possibly be part of section 1.1.2 of Appendix 5.1 or put in the applicable chapter 4 Appendices for non-generation resources.
- R04 proposes to remove the IESO monitoring requirements from Appendix 4.19 and replace it with a more generic requirement in Appendix 5.1 section 1.1.6. Are the existing requirements and the proposed requirements equivalent? Does not the existing Appendix 4.19 obligation on generators require the generator providing regulation to send a signal to the IESO every two seconds? The proposed change to section 1.1.6 requires the participant to be able to receive signals every two seconds.

R04 italicizing: page 17 of 23: I believe “ancillary service provider”, “black start capability” and “contracted ancillary service” at the start of section 7.1.1 should be italicized as they are defined terms under the market rules.

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: