



Market Rule Amendment Written Submission

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

Email Address: Rule.Amendments@theIMO.com

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 *IMO* 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 *IMO* 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: Sandy O’Connor, TransAlta Energy Corporation	
<i>(If applicable)</i> Market Participant / 106569	Market Participant Class:
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PART 2 – MARKET RULE AMENDMENT REFERENCE

<p>Type of Rule Amendment being commented on (please indicate with X):</p> <p><input checked="" type="checkbox"/> <i>Amendment Submission</i> ___ Proposed Rule Amendment ___ Recommended Rule Amendment</p>
<p>MR-# <u>00213-Q00</u></p> <p>This Market Rule number is located on the “Current Market Rule Amendment” web page.</p>
<p>Date relevant <i>Amendment Submission</i>, Proposed or Recommended Rule Amendment posted for comment: December 9, 2002</p>

PART 3 – COMMENTS ON RULE AMENDMENT

Provide your comments.

TransAlta Energy Corporation hereby provides comments in respect of Market Rule Amendment Submission MR-00213-Q00 pertaining to Connection Assessments, and described by the IMO as “Simplifying Connection Assessment Market Rules”. TransAlta may participant in any future discussions of the proposed Rule Amendment through the Market Operations Standing Committee.

TransAlta supports the general thrust of the IMO’s Rule Amendment submission designed to facilitate the evolution of the connection assessment process. TransAlta comments on the two noted “key issues” of interest to the technical panel.

KEY ISSUES COMMENT

1. The extent to which the System Impact Assessment conducted by the IMO and the Customer Impact Study conducted by Hydro One could occur in parallel.

Required IMO and Transmitter studies should occur in parallel, or be undertaken independent of each other’s assessment activities to the greatest extent possible. Neither the IMO nor the Transmitter should have to depend on the other institution reaching any given milestone or completing its study prior to undertaking or completing part or all of their own study. Only if there is a need for specific technical information transfer – for example, if the IMO depends on certain outcomes from the Transmitter’s study in order to proceed with its System Impact Assessment, or vice versa – should any one study by either the IMO or the Transmitter be dependent on the outcome of the other institution’s study. This will help facilitate and expedite connection assessment processes and minimize unnecessary process delays.

The objectives of IMO and Transmitter studies should complement each other to the greatest extent possible, with a minimum of overlap or redundancy. The IMO’s Connection Assessment process as described in Market Manual 2 part 2.10, and the Transmission System Code should be structured so as to minimize redundant connection assessment study activities on the parts of the IMO and the Transmitter.

PART 3 – COMMENTS ON RULE AMENDMENT

Provide your comments.

2. The respective roles of the Ontario Energy Board and the IMO in regard to the allocation of costs associated with connection assessment related activities.

The IMO's role in determining connection-related cost allocation should be to implement both the broad and the more specific cost allocation policy guidelines determined by the Ontario Energy Board (OEB). The OEB retains ultimate responsibility for cost allocation policy determination for all transmission system assets. The OEB's current and future transmission rate orders, and its eventual determination of allocation policies currently under review in the Transmission System Code proceeding (RP-2002-0120, RP-1999-0057, EB-2002-0242, RP-2002-0110) should include all direction required by the IMO to implement cost allocation policy.

The implementation of cost allocation specifics must remain the responsibility of the IMO, following OEB policy guidelines; it must not be the responsibility of the Transmitter. The Transmitter's role must remain a purely technical one, since the Transmitter has a commercial stake in the outcome of transmission cost allocation questions.

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: