



## 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](mailto: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

<b>Name:</b> Peter Alpajaro	
<i>(If applicable) Market Participant / Metering Service Provider No.<sup>1</sup>:</i>	<b>Market Participant Class:</b> Generator
<b>Telephone:</b> (519) 361-7051	<b>Fax:</b> (519) 361-1845
<b>Email Address:</b> peter.alpajaro@brucepower.com	

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

**PART 2 – MARKET RULE AMENDMENT REFERENCE**

<b>Type of Rule Amendment being commented on</b> (please indicate with X):
<u>Amendment Submission</u> <input checked="" type="checkbox"/> Proposed Rule Amendment <input type="checkbox"/> Recommended Rule Amendment
<b>MR-#</b> <u>00247-R00</u>
This Market Rule number is located on the “Current Market Rule Amendment” web page.
<b>Date relevant Amendment Submission, Proposed or Recommended Rule Amendment posted for comment:</b>

**PART 3 – COMMENTS ON RULE AMENDMENT**

Provide your comments.

Bruce Power is pleased that the Technical Panel has proposed that market participants that have non-quick start facilities that are part of an SPS and are tripped off by the activation of the SPS may claim compensation. This agreement in principle by the Technical Panel for compensation to market participants that are tripped off by the activation of the SPS is encouraging and provides a starting point for the fair treatment of these market participants.

Bruce Power is disappointed that the compensation for these market participants that are tripped off by the activation of the SPS is limited to the dollar equivalent of two-hours of constrained-off CMSC payments. The purpose of this compensation is to recognize the market benefits of the SPS and the risks borne by the market participant whose facility is part of the SPS, and to partially offset the absence of financial drivers that arise from the existing constrained-off CMSC payments. Two hours of constrained-off CMSC payments does not adequately recognize the market benefits nor does it recognize the risks of the SPS whose facility is part of the SPS. It is acknowledged that the SPS enables the market participant to deliver more of his energy to market than if an SPS had not been installed. However, it should be equally acknowledged that the installation of an SPS has saved the market the significant initial cost of building an adequate transmission system to deliver this energy.

If LMP is adopted in the future, the calculation of adequate compensation will be that much more difficult since CMSC payments will be eliminated. Compensation to market participants with the true cost of installing an SPS (i.e. lost market revenue and costs incurred as a result of SPS activation) instead of building the proper transmission infrastructure will improve transparency and provide the correct drivers for new transmission projects.

Bruce Power strongly suggests that this issue be routinely reviewed by the Technical Panel on an annual basis to ensure that the compensation for SPS activation is deemed fair and equitable.

**PART 3 – COMMENTS ON RULE AMENDMENT**

**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:

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