



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: TransAlta Energy Marketing Corp. _____

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

Telephone: 403-267-7638 _____ Fax: 403-267-2575 _____

E-mail Address: sandy_o’connor@transalta.com _____

PART 2 – MARKET RULE AMENDMENT REFERENCE

Type of Rule Amendment Being Commented on (please indicate with x):

Amendment Submission X Proposed Rule Amendment Recommended Rule Amendment

MR Number: MR-00306

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: February 15, 2006 _____

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.

The proposed amendment states that the local market power screens would be bypassed, and “under proposed new section 1.2.1A the IESO would undertake an analysis as set out in the applicable manual to determine if persistent, potentially inappropriate constrained off import or export payments exist.” The proposed amendment then goes on to state that the market manual would contain:

- 1) criteria for determining what constitutes persistent constrained off imports and exports; and
- 2) the manner for determining an initial estimated replacement price for the price that is under investigation.

TransAlta is concerned that both the criteria and the manner for determining replacement price are as yet undetermined and will be set out in the market manual, not the market rules. It does not seem appropriate that such significant tests be determined in the market manuals, through a process we believe to be much less rigorous than the Market Rule Amendment Process.

These two criteria are fundamental to this proposed amendment, and to approve this amendment without full knowledge of the criteria is inappropriate. TransAlta believes that market rules must be clear, transparent and developed with full stakeholder input.

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 Stakeholding meeting necessary/desirable (please indicate with x): X

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

This proposed rule amendment must include both the criteria for what constitutes persistent constrained off imports and exports; and the manner for determining an initial estimated replacement price for the price that is under investigation. TransAlta believes these should be determined with full stakeholder input.