

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: <u>Rule.Amendments@ieso.ca</u> 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

E-mail Address: Bellavance.erik@hydro.qc.ca_

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-00319_____

This *Market Rule* number is located on the "Current Market Rule Amendment" web page.

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

Part 1 – Submitter's Information

Date Relevant Amendment Submission, Proposed or Recommended Rule Amendment Posted for Comment: April 27, 2006

Part 3 – Comments on Rule Amendment

Provide your comments.

MEHQ understands IESO's desire to implement real-time intertie transaction failure charges at the same time it initiates DACP. MEHQ has no problem with IESO's proposal to manually calculate those charges. However, HQ believes that after IESO performs the calculations, it should notify affected parties in a timely manner, rather than monthly, via the preliminary settlement statement. Distributing this information on a monthly basis not only could frustrate an entity's desire to correct a situation affecting system reliability, but could place an entity at financial disadvantage.

MEHQ also believes that the manner in which IESO has submitted this amendment to stakeholders is unacceptable. Most companies operate without the luxury of excess personnel to fully cover all absences; providing one week for stakeholder comment seems excessively onerous and is definitely unfair.

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: