



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: Barry Green, Ontario Power Generation

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

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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-00326

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: January 18, 2007

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 following are OPG's comments on the draft market rule amendment > and the proposal from IESO staff to use the existing exemption process.

We agree with the IESO that ideally, remand authority should be > provided by legislation to the OEB. This would allow the OEB to play a > role with respect to the approval of mandatory reliability standards > analogous to that played by FERC in the U.S. Recent FERC decisions have made it clear that FERC intends to be actively involved in > reliability issues. We believe that it is inevitable there will be a > situation where Ontario's interests do not align with those of FERC.

Both the OPG proposal and the IESO staff proposal are imperfect solutions. The question remains as to which one can best protect Ontario's interests during the interim period until legislative change can be enacted.

In order to make such an assessment, it is necessary in OPG's view to examine in detail the path that would be followed in the event that an unacceptable standard is approved by the NERC Board. The Technical Panel, which includes many members that are not required to comply with reliability standards, is not the best forum for this detailed discussion to occur. Given that the IESO's new Reliability Standards Standing Committee is planning to meet in March, we propose that this meeting be used to discuss how the two alternative processes would be used to address a problematic reliability standard. It would be very helpful if OEB staff also participated in this forum.

This committee could then table its recommendation with the Technical Panel. The Panel could use the recommendation from the Standards Committee to facilitate its own discussion and recommendation to the IESO Board.

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: