



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: <u>Sandy O’Connor</u>	
<u>TransAlta Energy Marketing Corp.</u>	
(if applicable) <i>Market Participant / Metering Service Provider</i> No. ¹ : <u>106569</u>	<i>Market Participant Class:</i> _____
Telephone: <u>403-267-7638</u>	Fax: <u>403-267-2575</u>
E-mail Address: <u>sandy_o’connor@transalta.com</u>	

PART 2 – MARKET RULE AMENDMENT REFERENCE

Type of Rule Amendment Being Commented on (please indicate with x):		
X Amendment Submission	<input type="checkbox"/> Proposed Rule Amendment	<input type="checkbox"/> Recommended Rule Amendment
MR Number: <u>MR-00331-R00</u>		
This <i>Market Rule</i> 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: December 27, 2006

PART 3 – COMMENTS ON RULE AMENDMENT

Provide your comments.

TransAlta has been actively working with APPrO throughout this process. We support APPrO’s submission in this matter.

We would like to reiterate that the proposed rule change is in the direction of improving market operations and market efficiency for the reasons laid out in APPrO’s submission.

TransAlta believes that a move towards a 3 X ramp rate will more closely reflect the physical capabilities of the generators and result in a more accurate price for ramping services.

While our preferred solution would have been to move to a 1x ramp rate, TransAlta believes there has been an appropriate amount of stakeholdering done on this matter, and we support the IESO’s recommendation as an interim solution.

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:

