



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>TransCanada Energy Ltd.</u>	
(if applicable) <i>Market Participant / Metering Service Provider</i> No. ¹ : _____	<i>Market Participant Class:</i> <u>Generator</u>
Telephone: <u>416-869-2183</u>	Fax: <u>416-869-2114</u>
E-mail Address: <u>brian_kelly@transcanada.com</u>	

PART 2 – MARKET RULE AMENDMENT REFERENCE

Type of Rule Amendment Being Commented on (please indicate with x):	
<input checked="" type="checkbox"/> 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.	
Date Relevant <i>Amendment Submission</i>, Proposed or Recommended Rule Amendment Posted for Comment: <u>January 12, 2007</u>	

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.

TransCanada Energy Ltd. (“TCE”) would like to thank the IESO for the opportunity to comment on this Market Rule Amendment.

The use of the 12x Ramp Rate in the unconstrained algorithm was implemented prior to market opening as a temporary measure in order to mitigate high and rapid price spikes, which were believed would occur once the market opened.

TCE would like to echo its prior submission (of May 5, 2006), in that it does not support the continued use of the 12x Ramp Rate. While TCE supports this market rule amendment and moving towards a 3x ramp rate, TCE is still of the view that 1x myopic is the preferred result.

TCE expects the shift towards a 3x multiplier is a transitional one and strongly believes the IESO should consider and continue work on moving towards 1x myopic.

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: