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## Market Rule Amendment Written Submission

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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](mailto: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>Greg Olsen – Ontario Power Generation Inc.</u>	
(if applicable) <i>Market Participant / Metering Service Provider</i> No. <sup>1</sup> : _____	<i>Market Participant Class:</i> <u>Generator</u>
Telephone: <u>(416) 592-4401</u>	Fax: <u>(416) 592-8519</u>
E-mail Address: <u>greg.olsen@opg.com</u>	

### PART 2 – MARKET RULE AMENDMENT REFERENCE

<b>Type of Rule Amendment Being Commented on</b> (please indicate with x):		
<input type="checkbox"/> Amendment Submission	x <input type="checkbox"/> Proposed Rule Amendment	<input type="checkbox"/> Recommended Rule Amendment
<b>MR Number:</b> <u>MR-00337</u>		
This <i>Market Rule</i> number is located on the “Current Market Rule Amendment” web page.		
<b>Date Relevant <i>Amendment Submission</i>, Proposed or Recommended Rule Amendment Posted for Comment:</b> <u>November 6, 2007</u>		

<sup>1</sup> 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.

OPG has the following comments on the proposed market rule amendment MR-00337: Improving Dispute Resolution Process Efficiency and Flexibility.

Part 3

Item 1 a) of the Discussion states that summaries would only be published once a mediator or an arbitrator was appointed. According to section 2.9.2 of the rules, publication only occurs once an arbitrator is appointed.

Part 4

Section 2.1.3: The second and third references to “sections 2.5.3A to 2.7” should be changed to “sections 2.5.4 to 2.7” because the secretary does not receive the notice of dispute until section 2.5.3C.

Section 2.2.3.13: The section refers to Chapter 3, section 3A.1.5, which does not appear to exist in the rules.

Section 2.5.3: The section requires the applicant to include a summary of the notice of dispute for publication purposes when it is served on a respondent. Since the negotiations described in section 2.5.3A could result in revisions to the notice of dispute, would it be more appropriate to place the requirement for a summary in section 2.5.3C? This section allows either party to file the notice of dispute with the secretary in the event that the dispute is not settled through good faith negotiations.

**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: