



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: Mike Penstone

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

Telephone: 416-345-5444 Fax: 416-345-6949 _____

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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-00340-R00: Market Rules Content Policy

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: Posted for comment on November 28, 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.

Hydro One appreciates the opportunity to provide comments on MR-00340-R00: Market Rules Content Policy, before the market rule is considered at the Technical Panel on March 18, 2008.

Hydro One believes that MR-00340 provides an opportunity to clarify existing ambiguity on the content of many instruments, used by the IESO, that compel or obligate market participants to take action and/or incur costs.

Although MR-00340 addresses the content of the Market Rules, it does not address the content of other IESO instruments. In order to fully remove this ambiguity from the Market Rules, the Technical Panel should consider changing the definition of Market Manual in Chapter 11. Furthermore, the scope, purpose, development and approval processes of other instruments used by the IESO such as: Criteria, Standards, System Control Orders (SCOs) must be properly defined and described.

Specifically, the following changes should be made:

According to the Background section in MR-00340, “market manuals were created for the purpose of containing process details.” Therefore, the definition of “market manual” in Chapter 11 should be amended to be consistent with the intent of the content of market manuals (vs. market rules) as its current definition is inconsistent with this intent.

Current definition of Market Manuals from Chapter 11 of Market Rules:

Market manual means a published document that is entitled as such and that describes procedures, standards and other requirements to be followed, met or performed by market participants, the IESO and other persons in fulfilling their respective obligations under the market rules;

We propose that the definition is changed as follows:

Market manual means a published document that is entitled as such and that describes procedures; ~~standards and other requirements~~ to be followed, met or performed by market participants, the IESO and other persons in fulfilling their respective obligations under the market rules;

Once the definition of Market Manual is corrected, additional definitions for other instruments affecting Market Participants should be introduced.

MR-00340 should include clear criteria to determine the content of the above instruments.

Hydro One believes that these changes will provide market participants with the necessary clarity regarding the purpose, development and approval of the IESO instruments.

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: