



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: Greenfield Energy Centre LP

(if applicable) *Market Participant /
Metering Service Provider* No.¹: 109229

Market Participant Class:
Generator

Telephone: 519-867-5057

Fax: 519-867-3337

E-mail Address: tbaldwin@geclp.ca

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-00356-R00-R02

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: June 25, 2009

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.

General Comments:

- A. What will the IESO do in the case of generators who do not receive a Day Ahead guarantee as a result of broken schedules due to imports or other generators interfering? From our understanding of the proposed amendment, to receive a DA-GCG, the unit must be at its MLP for its complete MGBRT and thus at times where the unit is not completely scheduled it is not eligible for the guarantee. Does the IESO have sufficient authority under the Rules to deal with the issue and if so, how will they deal with the issue? Please provide your view on this.
- B. For our confirmation purpose, we would like IESO to confirm that, under amendment proposal, the MRT provision (in our case 11 hours MRT) will not be measured by IESO settlement for GCG eligibility and IESO will measure only MGBRT (in our case 7 hours for GTs and 5 hours for STG) for its eligibility instead. Please confirm.
- C. While Definitions were not part of the proposed market Rule Amendments, we would like to propose that the IESO review their definitions to make sure they are still appropriate in line with the proposed amendment, just in case.

MR-00356 R00:

- D. *“3.3A.10 A registered market participant for a dispatchable generation facility that was **deemed to have accepted** the guarantee in accordance with section 5.8.4 shall not increase the offer prices in its submitted price-quantity pairs corresponding to the generation facility’s minimum loading point for the minimum generation block run-time after the time of the publication of the constrained schedule resulting from the pre-dispatch of record.”*

We would like to confirm what the word *deemed* means in 3.3a.10 above.

For instance, if a facility with a MGBRT of 8 hours is at or above its MLP for 15 hours, which 8 hours is it deemed in? One presumes it is the first 8? We would appreciate it if you can answer this.

MR-00356-R01:

- E. *“4.7B.1.2 a. fuel costs for start up and ramp up to minimum loading point submitted by the market participant as outlined section **2.2B1.3**,” but this should be **2.2B1.4** as the correct reference based on the proposed amendment.*

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:

PART 4 – EXTERNAL CONSULTATION MEETING