



## 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](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: TransAlta Generation Partnership

Sarnia Regional Cogeneration Plant (SRCP)

(if applicable) *Market Participant /*

*Metering Service Provider* No.<sup>1</sup>: 109940

*Market Participant Class:*

Generator

Telephone: 403-267-7319

Fax: \_\_\_\_\_

E-mail Address: Jian\_Zhang@transalta.com

### 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-00366

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:** Feb. 25, 2010

<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.

TransAlta has reviewed the proposed rule amendment for TFE, and would like to provide the following comments about the cost incurred by the IESO in assessing the TFE application.

The proposed market rule 3.2A3.3 states that TFE applicant shall provide to the IESO , “an executed agreement to pay to the IESO an amount equal to all of the reasonable costs incurred by the IESO in assessing the TFE application.” As TransAlta commented on the IESO draft cost recovery principles previously on Feb. 11, 2010, the IESO work on assessing the TFE application is, from TransAlta point of view, a contract agreement between the TFE applicants and the IESO. As any contract agreement has a binding obligation on the two parties, both the applicant and IESO, it is the IESO's responsibility to strive to make the cost for assessing the TFE application, the contract, as accurate as possible. TransAlta understands that there will be some variance between the final actual cost invoice and initial cost estimate. But the variance should be within a reasonable and predefined range e.g.: plus or minus 10%.

When the applicants agree to the cost incurred by the IESO in assessing the TFE application in the agreement, they have made a business decision that they are willing to incur those costs to proceed with the TFE. If it is later determined by IESO that there are increased costs and they are of such a large magnitude that the applicants choose to withdraw the application, the proposed market rule 3.2A5.3 will not allow the applicants to recover the costs that were already incurred to that point. The applicants need some sort of cost guarantee with a predefined variance, so that they can make a fully informed decision to proceed or not with TFE. The proposed rule does not have this cost guarantee provision as the threshold of assessment cost can be changed during the course of TFE assessment according to the proposed rule 3.2A.5.

To conclude, TransAlta would like to see the IESO to review the proposed market rule and address the uncertainty of TFE assessment costs accordingly.

**PART 3 – COMMENTS ON RULE 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: