



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: George Blechta _____

(if applicable) *Market Participant /*
Metering Service Provider No.¹: 102287 _____ *Market Participant Class*: _____

Telephone: 705 693-2761 ex.3169 _____ Fax: 705-699-3201 _____

E-mail Address: gblechta@sudbury.falconbridge.com _____

¹ This number is a maximum of 12 characters and does not include any spaces or underscore.

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-00296-Q00/R00/R01

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:

May 31, 2005

PART 3 – COMMENTS ON RULE AMENDMENT

Provide your comments.

The recommended actions do not or have not been shown that they improve reliability to Market Participants.

IeSO should not change or adjust the market demand in the market schedule if the actual demand has been reduced by public appeal, voluntary industrial reduction, EDRP, voltage reduction or any other initiative that actually reduced demand.

Administering prices after the fact (two days) will do nothing to correct counter-intuitive signals. This kind of pricing just creates a transfer of wealth from loads to generators.

Correct prices have to be published in real time to stimulate demand response, since there is no generation available.

The order of emergency control actions should be reviewed and improved to stimulate demand response. EDRP should be moved up in priority and possibly enhanced.

IeSO should not rush into quick solutions; existing emergency control actions have been in place since market opening. Increasing market prices in today’s hybrid market will not get the required response or improve reliability. All options should be evaluated, and their full analysis should be performed. The proper and final Market Rule Amendment should be a total package not bits and pieces.

This market rule should not be presented to the IeSO Board until there is an effective, balanced and final consultation process. The new “Advisory Board” should vote in this issue.

PART 4 – EXTERNAL CONSULTATION MEETING

If you believe that a special meeting of stakeholders would be necessary/desirable to discuss the issues

PART 4 – EXTERNAL CONSULTATION MEETING

raised by the rule amendment, please complete the following information:

External Stakeholding meeting necessary/desirable (please indicate with x):

Reason(s) why you believe a meeting is necessary/desirable: