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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: Safety Power Inc.

(if applicable) *Market Participant /  
Metering Service Provider* No.<sup>1</sup>: \_\_\_\_\_

*Market Participant Class*: \_\_\_\_\_

Telephone: (416) 514-4721

Fax: (416) 667-5514

E-mail Address: robert.desnoyers@safetypower.ca

<sup>1</sup> 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-R00 and MR-00296-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:**

June 8, 2005

**PART 3 – COMMENTS ON RULE AMENDMENT**

Provide your comments.

Safety Power Inc. is a newly established company focused on the development of a strategic business opportunity involving the aggregation of standby generators in the Province of Ontario. The purpose of which is to provide a dispatchable generation asset base for use during peak periods. PowerStream Inc. and Safety Power Inc. have recently partnered to implement a "Pilot Project" within PowerStream's service area involving the use of a 1MW standby generator. The Project is expected to be operational this summer. We believe that the Safety Power Program is a viable solution to addressing the increasing power supply issues like those being experienced in the York Region. Furthermore, it is our strong belief that some form of realistic pricing compensation needs to be in place in order to provide the proper incentives to encourage investment in DR and peaking generation. This incentive can be in the form of "scarcity pricing" on the HOEP or some form of capacity payment made to companies like Safety Power. Safety Power Inc. is formally submitting these comments in support of the IESO's proposed rule ammendment and wish to congratulate you on your efforts to mitigate the counter-intuitive impact on electricity pricing during "emergency" situations.

**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**