



Market Rule Amendment Written Submission

This form is used to provide comment on a market rule amendment under consideration by the IMO. Please complete all four sections of this form and submit the completed form by email or fax to the following:

Email Address: Rule.Amendments@theIMO.com

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 *IMO* 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 *IMO* 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: Bruce Power LP, Corinne Draesner - Head of Production Coordination	
<i>(If applicable) Market Participant : 102323</i>	Market Participant Class: Generator
Telephone: 519 361 6344	Fax: 519 361 1845
Email Address: corinne.draesner@brucepower.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-# 00029-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:

PART 3 – COMMENTS ON RULE AMENDMENT

Provide your comments.

Bruce Power has reviewed the proposed amendment to the market rules and is satisfied that it is both reasonable and sound.

The amendment resolves the internal consistencies within the current market rules and establishes a more appropriate framework for the use of discretion in determining the appropriate sanctions for breaches of the market rules. At the same time it preserves an adequate framework for the application of determinate penalties as required by the current market rules.

The modification of ‘Market Clearing Price’ to ‘Market Price’ in formula based penalties effectively captures the requirement that penalties should be applicable in both the real time energy market and the operating reserve market(OR).

In addition the proposed changes to Appendix 3.1 ‘Application of Enforcement Actions’ are accepted since as is rightly pointed out an exhaustive list. The changes proposed appear to enhance the current market rules.

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: