



Market Rule Amendment Written Submission Form

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* will *publish* this *amendment submission* if the Technical Panel determines it warrants consideration and may invite public comment.

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	
UBS Warburg Energy (Canada) Ltd	
Name: Garrett Tripp	
(If applicable) Market Participant / Metering Service Provider No. ¹ :	Market Participant Class: wholesaler,
Telephone: 416-945-2002	Fax: 416-945-2045
Email Address: garrett.tripp@ubswenergy.com	

¹ This field is restricted to a maximum of 12 characters and does not allow any spaces or underscore.

PART 2 – MARKET RULE AMENDMENT REFERENCE

Type of Rule Amendment being commented on (please indicate with X on the right): <i>Amendment Submission</i> Proposed Rule Amendment Recommended Rule Amendment
MR-161
Date relevant <i>Amendment Submission</i> , Proposed or Recommended Rule Amendment posted for comment:

PART 3 – COMMENTS ON RULE AMENDMENT

Provide your comments.

<ul style="list-style-type: none">• The IMO should not create any permanent market rule specifically designed for NUGs with long term PPA’s with Ontario Hydro/OEFC. A competitive market must have consistency in its treatment of various types of market participants.• UBS Warburg Energy believes that Market rules should encourage the development of new generation resources in Ontario. These rules should be equitable but also reflect the desired generation composition of the IMO system.• To this end, UBS would support a Market Rule that allows small (<200MW) cogeneration facilities to be operated as self-scheduling generators. This rule would match the operational nature of cogeneration facilities, and hopefully, encourage new cogeneration development in Ontario.• Comment on IMO Principles<ul style="list-style-type: none">○ Reliability – The IMO cannot allow large unexpected deviations in generation output on its system. For this reason, the size of self-scheduling generators must be limited.○ Market Efficiency – UBS agrees that cogeneration output is affected by somewhat unpredictable nature of the steam host, while more importantly understanding that this rule amendment will create a potential market gaming opportunity.○ Fairness – To ensure fairness, the IMO must monitor and enforce a standard on conduct on a cogeneration unit operating under this rule amendment. If the unit is found to be chasing market prices as opposed to producing to meet steam requirements, then the unit must be categorized as an IMO (dispatchable) generator. Therefore, losing its self-scheduling ability.• UBS does not support the TSG as an enduring class.• No rule amendment should prohibit a cogeneration facility from being registered as fully dispatchable.

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 Stakeholding meeting necessary/desirable (please indicate with X):

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