



Market Rule Amendment Written Submission

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	
Name: Peter Bettle, Bruce Power	
<i>(If applicable) Market Participant / Metering Service Provider No. ¹:</i> 102323	Market Participant Class: GENERATOR, etc.
Telephone: (519) 361-7159	Fax: (519) 361 1845
Email Address: peter.bettle@brucepower.com	

PART 2 – MARKET RULE AMENDMENT REFERENCE

Type of Rule Amendment being commented on (please indicate with X): Not known
<input type="checkbox"/> <i>Amendment Submission</i> <input type="checkbox"/> Proposed Rule Amendment <input type="checkbox"/> Recommended Rule Amendment
MR-002000-Q00

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

Date relevant *Amendment Submission*, Proposed or Recommended Rule Amendment posted for comment: July 2002

PART 3 – COMMENTS ON RULE AMENDMENT

Provide your comments.

1. **Negative historical reference prices used in the price screen evaluation:** Bruce Power agrees with this amendment because it delivers what would seem to us to be the intent of the Rules –that the upper limit price should be more expensive than the reference price.
2. **Expanded inquiry details:** (s)1.6.6 We agree with this rule amendment because we believe that market transparency and simplicity is enhanced by not differentiating between classes of market participant unless justified by fundamental differences.
3. **Expanded inquiry details:** (s) 1.6.2 & 1.6.3 . We basically agree with this amendment but with reservations. On the one hand the IMO is asking the Market Participant to provide the evidence with which to find them guilty. This is contrary to the usually accepted legal principal of the prosecution having to prove guilt. On the other hand to ensure an orderly, efficient and competitive market the IMO needs fairly wide powers of investigation. What particularly worries Bruce Power is the IMO, having forced the MP to provide information, being at liberty to ignore it if it *'determines that such information is incomplete or inaccurate'* (s)1.6.2. The IMO needs to be prepared to defend an accusation that it ignored information because *'we did not like it'*. Such an accusation of bias and manipulation on the part of the IMO would be detrimental to the credibility of the market. With transparency of information the IMO will be able to quickly verify the integrity of an MP's actions and by extension MPs the integrity of both the IMO's and other MPs' actions. It is for this reason that we support both this amendment and the wider concept of making all market data available unless its release can be demonstrated to cause real commercial damage.
4. **On/Off Peak Periods** We support the amendment to changing the Market Rule definition of on-peak and off-peak to the generally accepted definition.

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: