



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: Larry Brooksbank	
<i>(If applicable) Market Participant / Metering Service Provider No. ¹:</i>	Market Participant Class:
Telephone:	Fax:
Email Address: ljbrooksbank@sympatico.ca	

PART 2 – MARKET RULE AMENDMENT REFERENCE

Type of Rule Amendment being commented on (please indicate with X):
<input checked="" type="checkbox"/> <i>Amendment Submission</i> <input type="checkbox"/> Proposed Rule Amendment <input type="checkbox"/> Recommended Rule Amendment
MR-00202-Q00
Date relevant <i>Amendment Submission</i>, Proposed or Recommended Rule Amendment posted for comment: August 23 rd 2002

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

PART 3 – COMMENTS ON RULE AMENDMENT

Provide your comments.

Five Nations Energy receives the Technical Panel reports of Andy Poray - and we want to add our support an item in one of his most recent reports (Aug 22, 2002).

The issue he made was in reference to the level of meter trouble reports. While Five Nations Energy and its customers would not have anywhere near the volume of reports experienced by Hydro One - it is nevertheless - in our view - excessive and time consuming. To date - all the reports are associated with system outages (all but one unplanned).

A few minute HV outage on Hydro One’s system (not even FNEI’s HV system) south of Moosonee - will generate 3 IMO reports (2 currently for Kashechewan and Fort Albany LDC’s - and 3 when Attawapiskat is connected in September) . Each must be responded to in 2 days or a 2nd report goes out on all 3 MMP’s.

Fortunately, we feel our MSP contract includes “investigations” (although this may now be challenged by the MSP) - but the time and volume has far exceeded what was anticipated. This no doubt will lead to much more unnecessarily costly future MSP contracts soon.

Lastly - the automatically generated memo to MMP’s on “ Late Response” is unnecessarily blunt when received by the MMP ; and would sometimes appear to have been sent even out automatically even though a report has been filed. This again creates added work to recheck a report was done.

FNEI would support the consideration of past practice as outlined in Mr Poray’s letter.

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: