



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: Andy Poray, Hydro One Networks Inc.	
<i>(If applicable) Market Participant / Metering Service Provider No. ¹:</i>	Market Participant Class: Transmitter/Distributor
Telephone: 416 345-5888	Fax: 416 345-5890
Email Address: andy.poray@HydroOne.com	

¹ This number is a maximum of 12 characters and does not include any spaces or underscore.

PART 2 – MARKET RULE AMENDMENT REFERENCE

<p>Type of Rule Amendment being commented on (please indicate with X):</p> <p><u> </u> <i>Amendment Submission</i> <u> X </u> Proposed Rule Amendment <u> </u> Recommended Rule Amendment</p>
<p>MR-# <u>MR-00247-R00-R02</u></p> <p>This Market Rule number is located on the “Current Market Rule Amendment” web page.</p>
<p>Date relevant <i>Amendment Submission</i>, Proposed or Recommended Rule Amendment posted for comment: May 5, 2004</p>

PART 3 – COMMENTS ON RULE AMENDMENT

Provide your comments.

<p>Hydro One in general supports the Market Rule amendment as proposed but has one comment regarding Section 8.4.1:</p> <p style="text-align: center;"><i>“8.4.1 A market participants whose facility is part of a manually armed SPS may reject a request to arm the SPS where the arming would endanger the safety of any person, damage equipment or violate any applicable law.”</i></p> <p>As currently stated in the above amendment proposal, it is not clear what is meant by the term “manually armed”, and why it is needed.</p> <p>The intent of this Market Rule amendment is to allow a market participant whose facility is part of an SPS to reject arming of the said SPS if that market participant deems this to be the appropriate action for the reasons stated in the amendment proposal.</p> <p>If the intent of the term “manually armed” is to refer to situations where an intermediary is used by the IMO to physically arm the SPS, as opposed to situations where the IMO can arm the SPS without the use of intermediary, then the inclusion of the terms “manually armed” is inappropriate. To do so would not meet the intent of the Market Rule amendment as originally proposed. A market participant whose facility is part of an SPS should be allowed to reject the arming of the SPS irrespective of how the arming is performed.</p> <p>If the intent of the term “manually armed” is meant to have another meaning and as such is required in the Market Rule amendment, then this term needs to be defined in Chapter 11 of the Market Rules.</p>

PART 3 – COMMENTS ON RULE AMENDMENT


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

A large, empty rectangular box with a thin black border, occupying the central portion of the page. It is intended for recording the details of an external consultation meeting.