



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: Peter Alpajaro	
<i>(If applicable) Market Participant / Metering Service Provider No. ¹:</i>	Market Participant Class: Generator
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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> X </u> <i>Amendment Submission</i> ___ Proposed Rule Amendment ___ Recommended Rule Amendment</p>
<p>MR-# <u> 00253 </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: February 17, 2004</p>

PART 3 – COMMENTS ON RULE AMENDMENT

Provide your comments.

<p>Bruce Power supports the Technical Panel’s recommendation regarding administrative pricing when the market is suspended.</p> <p>Specifically, Bruce Power supports the establishment of administrative prices for the most recent four business days and the most recent four non-business days rather than using the Strawman suggested approach of establishing separate administrative prices for each day of the week.</p> <p>The Strawman proposal would permit the price of electricity 4 weeks earlier to have a significant impact on the administered price and this would not be desirable for both consumers and suppliers since the market price could have changed quite significantly in that time period.</p> <p>Calculating administrative prices in the proposed alternative manner of the preceding 4 business days or of the preceding 4 non-business days would produce more reasonable and better representative prices because the market data <i>immediately</i> prior to the suspension is being employed in the calculation.</p> <p>Please consider adopting the Technical Panel’s recommendation for administrative pricing when the market is suspended.</p>
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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 Stakeholding meeting necessary/desirable (please indicate with X):

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

Further external stakeholding is not necessary.

PART 4 – EXTERNAL CONSULTATION MEETING

