



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: TransCanada Energy Ltd.	
<i>(If applicable) Market Participant / Metering Service Provider No.</i> ¹ : <u>104358</u>	Market Participant Class: Generator & Wholesale Consumer
Telephone: 416-869-2180	Fax: 416-869-2056
Email Address: margaret_duzy@transcanada.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><input checked="" type="checkbox"/> <i>Amendment Submission</i> <input type="checkbox"/> Proposed Rule Amendment <input type="checkbox"/> Recommended Rule Amendment</p>
<p>MR-# <u>00253-Q00</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:</p>

PART 3 – COMMENTS ON RULE AMENDMENT

Provide your comments.

<p>TransCanada Energy Ltd. (“TCE”) would like to thank the IMO for the opportunity to comment on MR-00253. TCE applauds the IMO for proposing a market rule amendment which strives to make administered pricing more predictable and transparent to market participants.</p> <p>In an event that does not exceed 24 intervals, the strawman recommends that the administered price and market schedule would equal either the “last good” or the “next good” interval. The interval chosen would be based on the IMO’s judgement as to which of the two intervals best reflects prices that would otherwise have been produced by the market. TCE is concerned about the lack of transparency in terms of what factors the IMO will consider when applying its judgement. TCE prefers that the IMO clearly define what factors will be considered when determining what administrative price will be applied to the interval(s) in question.</p> <p>In circumstances where the IMO-Administered market is suspended, TCE is in agreement with the Technical Panel’s (“TP”) recommendation. The TP recommends establishing administrative prices from the 4 most recent business days and 4 most recent non-business days prior to market suspension rather than using the suggested last 4 same days of the week. Using the former approach results in administrative prices that should be more reflective of the demand/supply conditions prior to market suspension.</p>
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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: