



Market Rule Amendment Written Submission

This form is used to provide comment on a *market rule* amendment under consideration by the *IESO*. Please complete all four sections of this form and submit the completed form by email or fax to the following:

Email Address: Rule.Amendments@ieso.ca
 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 *IESO* 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 *IESO* 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: <u>Erik Bellavance MEHQ</u>	
(if applicable) <i>Market Participant / Metering Service Provider</i> No. ¹ : _____	<i>Market Participant Class:</i> _____ <i>Marketer/Trader</i>
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PART 2 – MARKET RULE AMENDMENT REFERENCE

Type of Rule Amendment Being Commented on (please indicate with x):	
<input type="checkbox"/> Amendment Submission	<input checked="" type="checkbox"/> Proposed Rule Amendment
<input type="checkbox"/> Recommended Rule Amendment	
MR Number: <u>00306</u>	
This <i>Market Rule</i> number is located on the “Current Market Rule Amendment” web page.	
Date Relevant Amendment Submission, Proposed or Recommended Rule Amendment Posted for Comment: <u>February 14, 2006</u>	

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

PART 3 – COMMENTS ON RULE AMENDMENT

Provide your comments.

MEHQ fails to see the rationale upon which the IESO is about to most likely discriminate externals suppliers against internal generators, by implementing different set of rules applying to each. Furthermore, by articulating them in market manuals, the IESO grants itself unlimited authority and flexibility to establish and review those potential "discriminating" rules.

In the past, the importance of CMSC payments has been recognized and they are definitely a benefit to everyone in terms of reliability. Furthermore, they are a cheaper and more efficient alternative to heavy investments in transmission and generation in some specific constrained areas.

Besides, nothing precludes the IESO from sanctioning "fraudulent" behaviour at this time and therefore, no amendment are warranted in that regard if this is all what this amendment is truly about.

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:

We feel that a lot of issues still to be discussed in order for everybody to understand what really at stakes here with amendment and the potential damage it would create to the market (more expensive alternatives to reliability, higher prices, etc.).

