



## 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](mailto: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>Barry Green – Ontario Power Generation Inc.</u>	
(if applicable) <i>Market Participant / Metering Service Provider</i> No. <sup>1</sup> : <u>102200</u>	<i>Market Participant Class:</i> <u>Generator</u>
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E-mail Address: <u>barry.green@opg.com</u>	

### PART 2 – MARKET RULE AMENDMENT REFERENCE

<b>Type of Rule Amendment Being Commented on</b> (please indicate with x):		
<input type="checkbox"/> Amendment Submission	x <input checked="" type="checkbox"/> Proposed Rule Amendment	<input type="checkbox"/> Recommended Rule Amendment
MR Number: <u>MR-00306</u>		
This <i>Market Rule</i> number is located on the “Current Market Rule Amendment” web page.		
<b>Date Relevant Amendment Submission, Proposed or Recommended Rule Amendment Posted for Comment:</b> <u>February 15, 2006</u>		

<sup>1</sup> 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.

OPG has the following comments on the proposed market rule amendments for MR-00306:  
Constrained off CMSC Payments for Imports and Exports:

Section 1.2.1A of Appendix 7.6 states that the applicable market manual will outline the analysis that the IESO shall conduct to identify persistent constrained off events involving boundary entities. In addition, the criteria for determining what constitutes persistent potentially inappropriate payments will also be in the manual. While it is reasonable to place analysis detail in manuals that are not reviewed by the Technical Panel, the criteria to be used to determine inappropriate constrained off payments is a critical part of the process. These criteria should therefore be included in the rules and should explain how the IESO will define whether constrained off payments have been persistent, as well as why offer prices can be considered inappropriate. This information is required in the rules because the amendment describes a new right given to the IESO, it describes how and when these rights are to be fulfilled and it can have significant financial impact on market participants (reference: decision rules provided in IESOTP 160-8 “Content of Market Rules” Policy).

The rationale provided for this rule amendment is to address specific circumstances of market participant behaviour. Accordingly, the criteria should address the determination of which interties and which types of transactions (imports or exports) need to be considered for the analysis identified in Section 1.2.1A. This could be done in a similar manner that the designation of “uncontested export intertie” is applied by the IESO in accordance with Section 1.3.3.4 of Appendix 7.6.

**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: