



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: Barry Green – Ontario Power Generation Inc.

(if applicable) *Market Participant /
Metering Service Provider* No.¹: 102200

Market Participant Class:
Generator

Telephone: 416-592-7883

Fax: 416-592-8519

E-mail Address: barry.green@opg.com

PART 2 – MARKET RULE AMENDMENT REFERENCE

Type of Rule Amendment Being Commented on (please indicate with x):

Amendment Submission x Proposed Rule Amendment Recommended Rule Amendment

MR Number: MR-00308

This *Market Rule* number is located on the “Current Market Rule Amendment” web page.

Date Relevant Amendment Submission, Proposed or Recommended Rule Amendment Posted for Comment: January 12, 2006

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.

OPG has the following comments on the proposed market rule amendments covered by MR-00308: Settlement Charges for Real-Time Intertie Transaction Failures.

OPG agrees with the implementation of the import and export failure charge, but the conditions when a financial penalty as opposed to a settlement adjustment would apply should be clarified in Part 3 of MR-00308-R00.

At the moment, the following documents govern how compliance actions are taken by the IESO with respect to intetie transaction failures: Market Manual 2.15 Intertie Transaction Non-Compliance Financial Penalty; Guidelines for determining when failure for “economic” reasons in the NYISO jurisdiction may breach IESO Market Rules; and, Guidelines for determining when failure for “improper NERC tagging” in the MISO jurisdiction may breach IESO Market Rules. Given the proposed rule amendments in MR-00308, significant changes to the first two documents would be required. Part 3 of MR-00308-R00 should describe these changes. The type of information needed includes: criteria for bona fide and legitimate reasons; when the IESO decision about compliance with the criteria must be made; when and how the decision is released to the participant; and, when and how the participant can contest the decision. One example of a bona fide and legitimate reason is: a day ahead import which is subsequently reduced in the real time constrained dispatch schedule due to reasons internal to Ontario, yet is still scheduled in the real time market schedule.

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: