



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

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

Market Participant Class:
Generator

Telephone: _____

Fax: _____

E-mail Address: _____

PART 2 – MARKET RULE AMENDMENT REFERENCE

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

Amendment Submission Proposed Rule Amendment Recommended Rule Amendment

MR Number: MR-00316 - Day-Ahead Commitment Process - Minimum Generation Block Run-time

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: April 26, 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 concerns about operating problems that the proposed change may create.

The proposal changes the application of IESO constraints from one unit parameter well known and managed by the generator to a new IESO defined unit parameter. Specifically, at present, the IESO constrains the unit based upon the generator specified parameter, minimum run time (MRT). The proposal will change the IESO’s application of the constraint to the minimum generation block runtime (MGBT).

In the present practise IESO constraints are applied to the MRT which is based on the period from synch breaker close to synch breaker open. Once the synch breaker closes, there are a variety of legitimate unit-specific issues which affect the time to reach the minimum load point (which defines the start of the MGBT) and there is therefore uncertainty and lack of predictability of the unit performance in this time period. Therefore, the proposed change to applying constraints based on MGBT instead of MRT, in our opinion, requires further discussion.

We therefore recommend that the DACP Operations Working Group with possible involvement of the DACP Settlements WG as well, address this issue further and in greater detail prior to finalization of this 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 Stakeholdering meeting necessary/desirable (please indicate with x):

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