



## 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>Coral Energy Canada Inc.</u>	
(if applicable) <i>Market Participant / Metering Service Provider</i> No. <sup>1</sup> : <u>104350</u>	<i>Market Participant Class</i> : <u>Wholesale</u>
Telephone: <u>519-620-7712</u>	Fax: <u>519-624-7712</u>
E-mail Address: <u>pkerr@coral-energy.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	<input checked="" type="checkbox"/> Proposed Rule Amendment
<input type="checkbox"/> Recommended Rule Amendment	
<b>MR Number:</b> <u>MR-00319-R00</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>April 19, 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.

Coral appreciates the system issues, and implementation timing requirements, creating the need for this rule amendment, and supports the amendment based on the anticipated short time frame outlined in the proposal.

Since the intertie failure charge is new; the potential magnitude of the charges to participants; the need for participants to confirm the accuracy of their own settlement reconciliation systems; and the existing timeframe for submissions of notices of disagreement; Coral believes that consideration is warranted for a method of communicating the daily accumulating charges to participants in lieu of the daily preliminary settlement statements. As the IESO will be manually computing daily charges and accumulating them for manual inclusion on the settlement statement of the last trade day of the month, a process where the IESO sends their calculations to participants on a daily or weekly basis would benefit participants and hopefully not be too much incremental work for the IESO. This type of process would be understood to be informal, yet allow the participant to understand and validate the charges rather than wait to see them all appear on a single settlement statement and then potentially determine the need to submit a notice of disagreement.

**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: