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## Market Rule Amendment Written Submission

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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: \_\_\_\_\_ Gary Koestler \_\_\_\_\_

(if applicable) *Market Participant / Metering Service Provider No.*<sup>1</sup>: \_\_\_\_\_ *Market Participant Class:* \_\_\_\_\_  
 Consumer

Telephone: \_\_\_\_\_ 519 733-4488 \_\_\_\_\_ Fax: \_\_\_\_\_

E-mail Address: \_\_\_\_\_ gary.koestler@gmail.com \_\_\_\_\_

### 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-00362: Centralized Forecasting – Cost Recovery - SE-91  
 Renewable Integration Final Design Principles” – Principles 1 and 3” \_\_\_\_\_

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

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

**PART 1 – SUBMITTER’S INFORMATION**

Please enter your organization and contact information in full.

**Date Relevant Amendment Submission, Proposed or Recommended Rule Amendment Posted for Comment:** \_\_\_\_\_ March 24, 2011

**PART 3 – COMMENTS ON RULE AMENDMENT**

Provide your comments.

I would question why it is necessary to recover costs associated with forecasting services relating to variable generation as a procured service charge to consumers. It is clear that the problems associated with variable energy production is related mainly to wind and solar generated power, which is already highly subsidized by consumers and is also highly profitable for the companies engaged in this business. I would like to propose that IESO reassess this proposal with a view to making the providers of power responsible for the forecasting costs. In addition I would suggest that IESO establish a policy to ensure that all costs related to the variable nature of wind and solar power be borne by the providers, as long as consumers are paying above open market prices for this power.

**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: