



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: <u>Shell Energy North America (Canada) Inc. Paul Kerr</u>	
(if applicable) <i>Market Participant / Metering Service Provider</i> No. ¹ : <u>104350</u>	<i>Market Participant Class</i> : <u>wholesaler</u>
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PART 2 – MARKET RULE AMENDMENT REFERENCE

Type of Rule Amendment Being Commented on (please indicate with x):	
<input checked="" type="checkbox"/> Amendment Submission	<input checked="" type="checkbox"/> Proposed Rule Amendment <input type="checkbox"/> Recommended Rule Amendment
MR Number: <u>MR-00385-R00</u>	
This <i>Market Rule</i> number is located on the “Current Market Rule Amendment” web page.	
Date Relevant <i>Amendment Submission</i>, Proposed or Recommended Rule Amendment Posted for Comment: <u>December 1, 2011</u>	

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.

The proposed insertion to Ch 7 sec 5.7.1.3 relates to eligibility where there may be overlap of MGBRT from a RT GCG schedule being declared and an existing constraint, as with a DACP schedule for example. The subject hours are excluded from the eligibility criteria of having a pre-dispatch schedule for at least half of the MGBRT hours. In other words, just the hours outside of the already constrained hours are considered for the eligibility criteria.

A similar exclusion must be noted for the offer price eligibility criteria contained in sec 5.7.1.2 for the same reasons for excluding the hours themselves. The existing constraint hours have pricing and other data associated with them that should not be considered when evaluating the declaration and the GCG eligibility of the “new” schedule being evaluated. The prices offered for the non-overlapped hours of the MGBRT – ie, the ones being counted towards the half-MGBRT eligibility criteria, will almost certainly be different than the already-existing pricing related to the existing constrained hours, and should not be required to be the same for eligibility under the RT GCG run being declared. The participant needs to manage their DACP data to achieve the desired outcomes for themselves and the market.

For example: A resource has a 6 hour MGBRT and has an existing DACP constraint / schedule that they need to manage and achieve, and the participant offers other hours in such a way as to achieve a pre-dispatch RT schedule with at least 3 hours at or above MLP in advance of the first hour of the DACP schedule. Just as the IESO is proposing that the half-MGBRT criteria only apply to the hours in advance of the existing schedule, the criteria requiring all prices in the PQ pairs for the MLP for all hours of the MGBRT should be modified to only apply to these 3 or more hours outside of the existing constraint. Adding text in 5.7.1.2 similar to the proposed text for 5.7.1.3 is necessary to achieve the exclusion of the hours already constrained from the offer price eligibility test.

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: