



## 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 to the following:

Email Address: [Rule.Amendments@ieso.ca](mailto:Rule.Amendments@ieso.ca)  
**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: Shell Energy North America (Canada) Inc. ... Paul Kerr

(if applicable) *Market Participant / Metering Service Provider* No.<sup>1</sup>: 104350

*Market Participant Class:*  
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### 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-00407

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:** March 27, 2014

<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.

Shell Energy supports the principles raised and wording proposed by APPrO and urges the Technical Panel to adopt them in the final rule. These changes represent improvements in both the construction and clarity of the rule that are necessary.

Although some focus has rightly been placed on key issues such as being able to defend against accusations and establishing a reasonable limitation period, the Panel must also consider the important improvements to the conduct types noted in 10A.1. To date, the IESO has refused to provide examples of conduct that might fit with each of the prohibitions. It is difficult for participants to understand, let alone comment on, the potential implications of the wording chosen to describe conduct. This makes it all the more important that the changes proposed by APPrO are adopted as improvements.

Has the IESO through MACD identified or observed behavior by any market participant(s) that they consider meets any of the conduct areas in 10A.1? Has MACD contacted the participant(s) to discuss the behavior? Are there any participants where MACD has observed behavior that it thinks might fall under the future general conduct rule, but where MACD has not made contact with the participant to discuss the behavior?

**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: