



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
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: David Peterson _____

(if applicable) *Market Participant / Metering Service Provider* No.¹: 102200 _____ *Market Participant Class:*
Generator _____

Telephone: 416-592-3081 _____ Fax: _____

E-mail Address: david.peterson@opg.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-00417 _____

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 2, 2015 _____

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.

With regards to Chapter 7 s.12.1.3 the proposed rule amendment eliminates the need for the publication of a major change advisory for expected changes in load. In discussion with the IESO it was thought that the more frequent publication of load changes through the hourly adequacy report would eliminate this need and that these hourly revisions would be in smaller increments. OPG believes that there will continue to be occasions when there will be intra-hour changes in a load forecast of sufficient magnitude to warrant an intra-hour notification to participants. OPG acknowledges that this will likely be less frequent but it does not eliminate the need. OPG requests that this requirement be addressed through this rule amendment or through other means.

With regards to Chapter 5 s.7.4.4.1.3 OPG would like to propose an addition to the rule as written. This section currently reads “expected transmission limits with *outages*”. OPG is proposing to add “and deviations from normal limits”. This addition is seen as more encompassing and would capture limit changes that were a result of system conditions and not an outage related condition.

With regards to Chapter 7 s.12.1.1.8 3 OPG would like to propose an addition to the rule as written. This section currently reads “provide forecasts of expected transmission limits with *outages*...”. OPG is proposing to add “and deviations from normal limits” for similar reasons as stated above.

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: