



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: Wescast Industries Inc., Mark Simpson

(if applicable) *Market Participant /
Metering Service Provider* No.¹: 102243

Market Participant Class:
non-dispatchable load

Telephone: 519-750-0000 ext. 1377

Fax: 519-720-1629

E-mail Address: mark.simpson@wescast.com

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

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-00296-R00

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:

June 8, 2005

PART 3 – COMMENTS ON RULE AMENDMENT

Provide your comments.

Wescast Industries supports amending section 3.2.1.4 in Appendix 7.5 as described as this sends a real time signal to the market that will reduce the possibility of sending counter-intuitive price signals.

Wescast Industries supports the addition of section 3.2.1.12 in Appendix 7.5 as it is described in the proposed ammdement. We agree with the principle of offsetting the demand where the IESO knows with certainty the impact of the emergency control action taken.

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:



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PART 2 – MARKET RULE AMENDMENT REFERENCE

<p>Type of Rule Amendment Being Commented on (please indicate with x):</p> <p><input type="checkbox"/> Amendment Submission <input checked="" type="checkbox"/> Proposed Rule Amendment <input type="checkbox"/> Recommended Rule Amendment</p> <p>MR Number: <u>MR-00296-R01</u></p> <hr/> <p>This <i>Market Rule</i> number is located on the “Current Market Rule Amendment” web page.</p> <p>Date Relevant Amendment Submission, Proposed or Recommended Rule Amendment Posted for Comment:</p> <p>June 8, 2005</p>
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PART 3 – COMMENTS ON RULE AMENDMENT

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<p>Wecast Industries does not support MR-00296-R01. During a situation that requires the IESO to take emergency control actions, it is paramount that the IESO send a signal to the market in real time. The Market Rules currently provide for Administrative after-the-fact price changes for specific circumstances, but we do not feel it is appropriate to expand the Administrative Pricing rules to accommodate after-the-fact price changes in the solution to counter-intuitive pricing.</p> <p>Implementing MR-00296-R01 does nothing to improve the reliability of the system during the event requiring the emergency control actions.</p> <p>Implementing MR-00296-R00 will produce real-time price signals providing participants opportunities to respond. Doing anything outside of real time could expose consumers to very high market prices without them having had any opportunity to respond.</p>

PART 4 – EXTERNAL CONSULTATION MEETING

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Reason(s) why you believe a meeting is necessary/desirable:

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