



**Market Rule Amendment Written Submission**

This form is used to provide comment on a market rule amendment under consideration by the IMO. Please complete all four sections of this form and submit the completed form by email or fax to the following:

Email Address: [Rule.Amendments@theIMO.com](mailto:Rule.Amendments@theIMO.com)  
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 *IMO* 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 *IMO* 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*.

<b>PART 1 –SUBMITTER’S INFORMATION</b>	
Please enter your organization and contact information in full	
<b>Name: Corrine Draesner, Head of Production Coordination, Power Marketing, Bruce Power</b>	
<i>(If applicable) Market Participant / Metering Service Provider No. <sup>1</sup>:</i>	<b>Market Participant Class: Generator</b>
<b>Telephone: (519) 361-2673 ext. 6344, (519) 361-1845</b>	<b>Fax:</b>
<b>Email Address: corinne.draesner@brucepower.com</b>	

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

**PART 2 – MARKET RULE AMENDMENT REFERENCE**

<p><b>Type of Rule Amendment being commented on</b> (please indicate with X):</p> <p><u>    </u> <i>Amendment Submission</i> <u>  X  </u> Proposed Rule Amendment <u>    </u> Recommended Rule Amendment</p>
<p><b>MR-00219-R00-01</b></p> <p>This Market Rule number is located on the “Current Market Rule Amendment” web page.</p>
<p><b>Date relevant <i>Amendment Submission</i>, Proposed or Recommended Rule Amendment posted for comment: February 28, 2003</b></p>

**PART 3 – COMMENTS ON RULE AMENDMENT**

Provide your comments.

Our outage schedules are driven by our regulator, the CNSC. There is little flexibility in these schedules, and outages are planned years in the future.

The premise that the IMO can refuse these outages two days prior to their start does not help our planning process. I would suggest that the Market participants need to consider revising these rules, so that the generator knows at least three months in advance , if their outage is likely to be rejected.

The program which is proposed to be 'strictly voluntary' now may become mandatory, especially if the IMO market has difficulty attracting imports

It may be difficult for a generator to procure replacement import energy, in today's illiquid market

It exposes the generator to financial risk, if the replacement energy cannot be delivered

It exposes the generator to risk if the energy amount or inertia proposed is not accepted by the IMO. Furthermore the generator may have to arrange for far more replacement energy that would likely to be required, in the event of a longer outage with varying capacity margins

This proposal appears to be attempting to accomplish what the open market is supposed to accomplish - ie attract sufficient imports to satisfy supply deficiencies. I suspect this would appeal to few external generators, as it would potentially limit the amount of revenue they could obtain from selling into Ontario.

Last, but not least, the UK experience with this type of scheme is not favourable - the general reaction is 'that sounds like, or will lead to NETA', and NETA has driven energy market prices down to the lowest levels since the electricity market opened 12 years ago.

**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 Stakeholding meeting necessary/desirable (please indicate with X):

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