



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

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*.

PART 1 –SUBMITTER’S INFORMATION

Please enter your organization and contact information in full

Name: Ryan Benner, Dofasco Inc.	
<i>(If applicable) Market Participant / Metering Service Provider No. ¹:</i>	Market Participant Class:
Telephone: 905-548-4223	Fax: 905-548-4257
Email Address: ryan_benner@dofasco.ca	

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): <u> X </u> <i>Amendment Submission</i> ___ Proposed Rule Amendment ___ Recommended Rule Amendment
MR-# <u> 00253-Q00 </u> This Market Rule 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: February 18, 2004

PART 3 – COMMENTS ON RULE AMENDMENT

Provide your comments.

<p>It is understandable that when the market is not suspended and the IMO administers pricing for less than 24 intervals, participants accept the market schedule and pricing. During times where the event exceeds 24 intervals it would be fair for participants to receive compensation equal to their incremental costs, but not an additional 10% for profit. In these instances both sides of the market are affected, for example on January 15 customers made operational decisions based on market pricing. When this pricing is administered after the fact those operational decisions cannot be changed and profit for downtime cannot be recovered. During times of market suspension it is most likely due to a severe stress on the system and all market participants should be responsible and follow the instructions of the IMO or the government (in the case of the August blackout). It is unfair to generators that are unable to generate and loads that may have had to forgo production to have a few lucky people profit from their ability to generate. This is not “sharing the pain” in an equitable fashion. It’s seems fair they can recover their costs but to add a profit margin is unconscionable.</p>
--

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): **X**

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

We feel all rule amendments that involve addition payments should be stakeholdered. In this case we feel that in certain situations, like during market suspension, actions are taken by the IMO to ensure the reliability of the system and are for the good of the market. If one half of the market is able to seek additional compensation and up to 10% profit, what incentive is that for the other half of the market to follow the IMO's requests?

PART 4 – EXTERNAL CONSULTATION MEETING