

**From:** David Butters  
**Sent:** March 6, 2009 4:15 PM  
**To:** IESO Stakeholder Engagement  
**Subject:** More Efficient Uniform Price Study

APPrO has reviewed the February 19, 2009 document entitled "Relevant Issues to be examined under More Efficient Uniform Price Study" with interest.

First, we find the document falls somewhat short of providing a list of the critical issues that must be included in any review of Uniform Pricing, not the least of which is the gap that frequently exists between the market price for energy and the value of the underlying commodity.

But more important, while APPrO remains convinced of the IESO's ongoing commitment to market evolution, we are concerned by the recent decision regarding the Peak vs. Average Issue, which showed clear benefits for the market, but failed to be adopted due to the current state of the economy. If these clearly beneficial changes cannot be adopted under the current economic climate, it is not clear to us how we could make additional commitments of time and effort for a review of "More Efficient Uniform Pricing". An efficient price tends to be a higher price, and if that is to be an ongoing impediment to market improvements, then it argues against committing scarce IESO and stakeholder resources on this effort.

The recently introduced Green Energy and Green Economy Act, if passed, will no doubt result in other, equally pressing issues requiring both the IESO's and Market Participants' attention. This will put additional pressure on the IESO's limited resources, which we understand to be constrained.

As I have noted elsewhere, Surplus Baseload Generation, Dispatch and SGOL/EDACP issues are much more likely to be the ones that will require our attention.

This response is not intended to suggest that we cannot or should not support MEUP. But in the current circumstances, we feel this initiative is unlikely to bear fruit.

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