

Market Rule Amendment Submission

This form is used to request an amendment to, or clarification of, the *Market Rules*. Please complete the first four parts of this form and submit the completed form by email or fax to the following:

Email Address: <u>Rule.Amendments@ieso.ca</u> Fax No.: (416) 506-2847 Attention: Market Rules Group **Subject: Market Rule Amendment 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* will *publish* this *amendment submission* if the *Technical Panel* determines it warrants consideration and may invite public comment.

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 contact information in full.			
Name: <u>TransAlta Energy Corporation (Attn: Peter Smith) and Arise Technologies Corporation (Attn:</u> Jeff Dawkins)			
(if applicable) <i>Market Participant /</i> <i>Metering Service Provider</i> No. ¹ : <u>106569 (TransAlta)</u>	Market Participant Class: Generator		
Telephone: <u>1-519-464-5975 (Smith) and 1-519-772-</u> <u>5713 (Dawkins)</u>	Fax: <u>1-519-464-5946 (Smith) and 1-519-725-</u> 8907 (Dawkins)		
E-mail Address: Peter_Smith@transalta.com and Jeff.Dawkins@arisetech.com			

PART 2 - MARKET RULE AMENDMENT SUBMISSION INFORMATION

Subject: <u>Settlement t</u> <u>elements.</u>	reatment for multipl	e facilities con	nected to customer owned transmission	
Title: <u>Settlement Aggregation</u>				
Nature of Request (pl	ease indicate with x)		
X Alteration	Deletion	X Addition	Clarification	
Chapter: <u>7 & 9</u>	Appendix:		Sections: 2.3.2B of Ch.7 & xx of Ch.9	

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

PART 1 – SUBMITTER'S INFORMATION

Sub-sections proposed for amending/clarifying:

PART 3 – DESCRIPTION OF THE ISSUE

Provide a brief description of the issue and reason for the proposed amendment. If possible, provide a qualitative and quantitative assessment of the impacts of the issue on you and the *IESO-administered markets*. Include the Chapter and Section number of the relevant *market rules*.

There are instances where for operational reasons the IESO requires that a participant with a single customer connection to IESO controlled grid (ICG) register multiple facilities behind that connection as though each was directly connected to the ICG at different points. Dealing with these operational concerns through this registration methodology leads to a settlement treatment that disadvantages these resources relative to other customer connected facilities. Where other facilities would be able to operate and settle as a single facility these resources are prohibited from taking advantage of the operational and settlement implications of the single registered facility. Although it is accepted that the operational needs of the ICG are paramount the need to have this granularity for operations should not penalize these facilities by forcing a more costly settlement treatment.

Specifically, this rule amendment submission would permit all registered facilities, directly connected to customer owned equipment that is in turn directly connected to the ICG, to be treated for settlement purposes as if a single facility when the IESO requires disaggregated registration for operational concerns.

PART 4 – PROPOSAL (BY SUBMITTER)

Provide your proposed amendment. If possible, provide suggested wording of proposed amendment.

Chapter 7 Section 2.3.2B

Where the IESO has deemed for the security or reliability of the IESO-controlled grid that a directly connected facility (including a generating unit or load facility) must be registered as more than one facility, those registered facilities shall be eligible for settlement in accordance with Chapter 9 Section xx.

Chapter 9 Section xx

Where pursuant to Chapter 7 Section 2.3.2B, the IESO has required the registration of multiple facilities (including a generating unit or load facility) for security or reliability purposes, the IESO will where applicable for settlement purposes:

- use an aggregated AQEI/AQEW for the common facilities;
- use aggregated dispatch data; and
- use aggregated dispatch instructions.

PART 4 – PROPOSAL (BY SUBMITTER)

PART 5 – FOR IESO USE ONLY

Technical Panel Decision on Rule Amendment Submission: Warrants consideration.			
MR Number: MR-00352			
Date Submitted to Technical Panel: December 10, 2008			
Accepted by <i>Technical Panel</i> as: (please indicate with x) Date:			
General Urgent Minor December 16, 2008			
Criteria for Acceptance: <u>It identifies ways to better enable the market to satisfy market design</u> principles. This amendment submission addresses the market design principle of fairness. TransAlta submits that the current settlement treatment for the facility in question is different from that which is afforded to other similar facilities only because of reliability based operational requirements defined in the market rules. Priority: <u>Medium</u> .			
Criteria for Assigning Priority: Pervasiveness of the problem.			
Not Accepted (please indicate with x):			
Clarification/Interpretation Required (please indicate with x):			
Technical Panel Minutes Reference: IESOTP 221-1			
Technical Panel Comments:			