

August 4, 2011

IESO Market Rules Group

**Re: Enhanced Day-Ahead Commitment Process Market Rules True-up
Part Two**

The Power Workers' Union ("PWU") represents a large portion of the employees working in Ontario's electricity industry. Attached please find a list of PWU employers.

The PWU is committed to participating in electricity sector consultations to contribute to the development of policy and practices that ensures ongoing service quality, reliability and safety at a reasonable price for Ontario customers. To this end, please find the PWU's comments on the Enhanced Day-Ahead Commitment Process Market Rules True-up Part Two.

We hope you will find the PWU's comments useful.

Yours very truly,

Don MacKinnon

Encl.

cc: John Sprackett
Judy Kwik

List of PWU Employers

Algoma Power
AMEC Nuclear Safety Solutions
Atomic Energy of Canada Limited (Chalk River Laboratories)
BPC District Energy Investments Limited Partnership
Brant County Power Incorporated
Brighton Beach Power Limited
Brookfield Power – Mississagi Power Trust
Bruce Power Inc.
Capital Power Corporation Calstock Power Plant
Capital Power Corporation Kapuskasing Power Plant
Capital Power Corporation Nipigon Power Plant
Capital Power Corporation Tunis Power Plant
Coor Nuclear Services
Corporation of the City of Dryden – Dryden Municipal Telephone
Corporation of the County of Brant, The
Coulter Water Meter Service Inc.
CRU Solutions Inc.
Ecaliber (Canada)
Electrical Safety Authority
Erie Thames Services and Powerlines
ES Fox
Great Lakes Power Limited
Grimsby Power Incorporated
Halton Hills Hydro Inc.
Hydro One Inc.
Independent Electricity System Operator
Inergi LP
Innisfil Hydro Distribution Systems Limited
Kenora Hydro Electric Corporation Ltd.
Kincardine Cable TV Ltd.
Kinectrics Inc.
Kitchener-Wilmot Hydro Inc.
Lake Superior Power Inc. (A Brookfield Company)
London Hydro Corporation
Middlesex Power Distribution Corporation
Milton Hydro Distribution Inc.
New Horizon System Solutions
Newmarket Hydro Ltd.
Norfolk Power Distribution Inc.
Nuclear Waste Management Organization
Ontario Power Generation Inc.
Orangeville Hydro Limited
Portlands Energy Centre
PowerStream
PUC Services
Sioux Lookout Hydro Inc.
Sodexo Canada Ltd.
TransAlta Generation Partnership O.H.S.C.
Vertex Customer Management (Canada) Limited
Whitby Hydro Energy Services Corporation

EDAC Market Rules True-up Package #2

Comments of the Power Workers' Union

The Independent Electricity System Operator (“IESO”) invites comments on the IESO Technical Panel’s recommended market rule amendment MR-00382: EDAC Market Rules True-up Package #2.¹

The recommended changes include a fourth set of market rule amendments to implement the EDAC process design approved by the IESO Board in February 2009. The EDAC Project Advisory Group identified changes that are necessary to address additional design detail changes to the following approved amendments:

- 1) MR-00348: EDAC - 24 Hour Optimization and 3-part Offers
- 2) MR-00349: EDAC - Settlement Guarantees
- 3) MR-00375: EDAC - Market Rules True-Up Package

The IESO states that the proposed changes are intended to generally provide greater clarity and consistency with previously approved EDAC market rule amendments.

The Power Workers’ Union (“PWU”) generally supports the proposed amendments to the dispatch process which assist in improving the overall efficiency of the wholesale electricity system and fairness of the dispatch process.

The following are specific comments on several of these amendments:

- 1) In light of the very significant changes to the IESO controlled grid the PWU supports the proposed change to section 3.8F.1.2 of MR-00382-R01, which stipulates the application of the Day-ahead Generator Withdrawal Charge under the circumstance described in the amendment below, as a necessary amendment:

the IESO has not determined, nor has the market participant demonstrated to the satisfaction of the IESO,

¹ <http://ieso.ca/imoweb/pubs/mr2011/MR-00382-Q00.pdf>

that the failure is to prevent endangering the safety of any person, damage to equipment, or violation of any applicable law.

- 2) The PWU also supports the proposed change to section 4.10.2.2 of MR-00382-R01 related to the Inter-Hour/Multi-Hour Constraints that modifies the wording and constraint calculation to a three part constraint for start up, continued on, and shut down scenarios aimed at more clearly defining the varying ramping limits placed on generators, as necessary:

The following three part constraint ensures that energy schedules do not exceed the generation facility's ramp capability in the hours where the generation facility starts, stays on and shuts down.

The PWU believes the IESO should continue with the integration process under SE-91 as more variable generation is added to the IESO controlled grid and the Local Distribution Companies' systems in a manner that ensures that the EDAC implementation is not detrimentally impacted.