

Market Rule Amendment Written Submission Form

Please complete all four sections of this form and submit the completed form by email or fax to the following:

Email Address: <u>Rule.Amendments@theIMO.com</u> 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* 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 your organization and contact information in full

| Name: Fabio Schuler | |
|--|-------------------------------|
| (<i>If applicable</i>) Market Participant / Metering Service Provider No. ¹ : 105189 | Market Participant Class: TSG |
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| Email Address: <u>schuler@whitbycogen.com</u> | |
| | |

¹ This field is restricted to a maximum of 12 characters and does not allow any spaces or underscore.

PART 2 – MARKET R ULE AMENDMENT REFERENCE

Type of Rule Amendment being commented on (please indicate with X on the right):

Amendment Submission X Proposed Rule Amendment Recommended Rule Amendment

MR-

Date relevant *Amendment Submission*, Proposed or Recommended Rule Amendment posted for comment: comments are to be submitted to the IMO by June 28 2002.

PART 3 – COMMENTS ON RULE AMENDMENT

Provide your comments.

Comments on proposal rule amendment:

- 1. Establish a separate class of generating facility called SCG (scheduling co-generator).
- 2. SCG would operate similarly to the existent TSG category, however in a permanent basis provided that qualifications conditions below are satisfied in an annual basis. There should be provisions to minimize the impact of force majeure during the year to correct the effect of such events.
- 3. In order to qualify to be a SCG the following criteria must be satisfied by the generating facility: a) generating facility should simultaneously produce electricity and process heat for a heat load host; b) average heat load, calculated as net energy supplied to the heat load host expressed in MWh equivalent, should be at least 20% of the electricity produced, expressed in MWh net of any electrical energy required for auxiliaries; c) generating facility should be rated not greater than 200 MW.

PART 3 – COMMENTS ON RULE AMENDMENT

Provide your comments.

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:

This rule amendment has an impact in several existent generators in Ontario and in future new facilities. A open discussion is desirable to allow an in-depth review of all possible alternatives to define the best way to amend Market Rules.