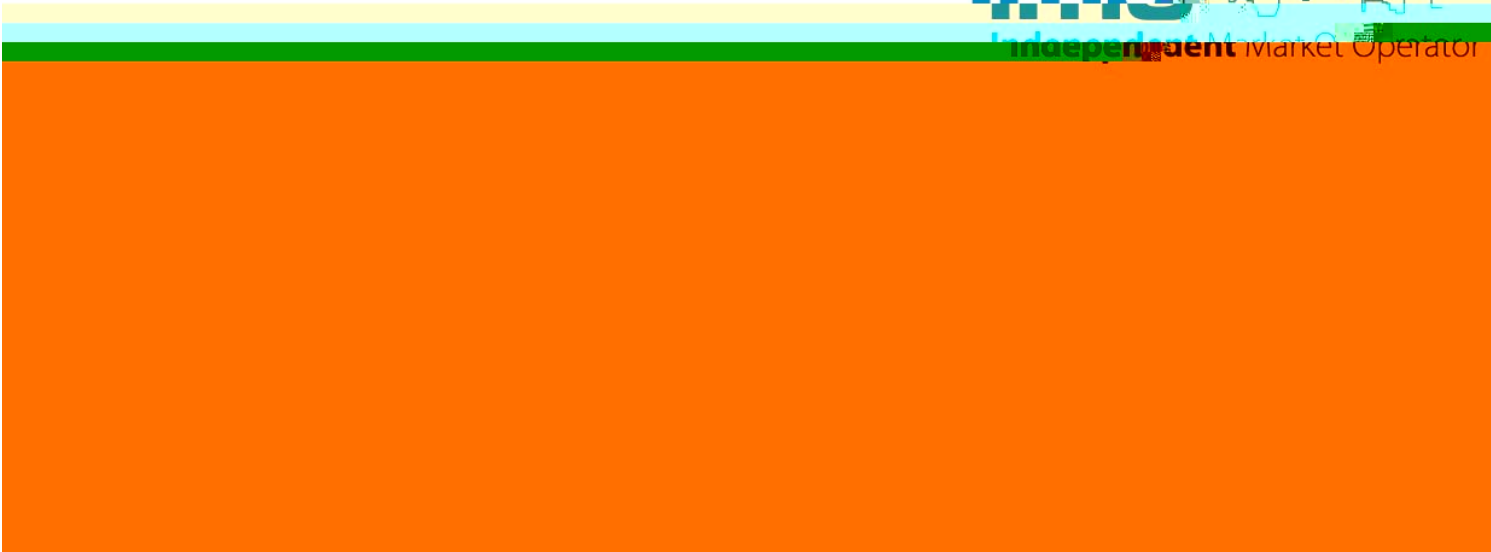

**Wholesale Electricity Market
Rule Change Proposal Submission Form**

RC_2011_10 Competitive Balancing and Load Following Market

Submitted by

Name: John Rhodes



Miscellaneous Comments

6.5C.7(a) makes reference to 6.11.1(f) – the latter is undefined; is 6.11.1(a) the correct

7A.1.15 – incorrect reference in the clause; should be 7A.1.14, not 7A.1.15. Also, in the interests of transparency, the IMO may wish to consider including an obligation to consult with the market prior to changing the point in time determined under clause 7A.1.14.

7A.3.5(a) – consider inserting “under the clause 7A.3.2” after the words “determine the Balancing Merit Order” to improve clarity.

7A.3.6(b) – clarity would be improved by including the words Relevant Dispatch Quantity as follows:

(b) the Relevant Dispatch Quantity, which is the sum of the EOI Quantities.....

7A.3.7 – Does “Pricing BMO” need to be defined in the Glossary or in this clause?

7A.3.7(c) – Given this clause requires the provisional Balancing Price to be published on the Market Web Site, then this should be a term defined in the Glossary. Also suggest that Price be expressed in lower case as it does not appear to be a defined term.

Clause 7A.3.7 requires the IMO to publish the provisional Balancing Price (for a Trading Interval where it has been provided with information under 7A.3.6) by the end of the Trading Day following the Trading Day to which it applies i.e. within 24 hours of the end of the relevant Trading Day. Clause 7A.3.10 requires the IMO publish the Balancing Price for each Trading Interval in a Trading Day by no later than 38 hours of the end of that relevant Trading Day. Given that the provisional Balancing Price may be amended within 14 hours after being published, clarity would be enhanced if the provisional Balancing Price was published with the prefix “Provisional”, which is then removed once clause 7A.3.9 applies or the Balancing Price is published under clause 7A.3.10. Information users observing the prefix “Provisional” would then be on notice that the price may change, however, once the prefix is removed, they would know that the price is firm and is not subject to further change.

7A.3.8 – insert “provisional” before the words “...Pricing BMO accordingly”.

7A.3.12(a) – appears that the work “recent” is missing from the sentence:

“....the most [recent] Relevant Dispatch Quantity...”; the suggested inclusion is shown in square brackets.

7A.3.12(c) – formatting error: insert “semicolon and” after (a) with the appropriate carriage returns.

7A.3.16(a)(ii) –reference to 7A.3.16(a) should be 7A.3.16(a)(i).

7A.3.17A – reference to 7A.3.17A should be 7A.3.17.

7B.2.3 – typo: remove] after 6:00PM.

9.8.1 – typos: A. Incorrect reference to 6.14.2 in Balancing Price definition; in fact a better definition, that allows for the provisional Balancing Price to be amended is:

“Balancing Price (d,t) is the Balancing Price for the Trading Interval t of Trading Day d published in accordance with clause 7A.3.10.”

B. Insert “and” between “...for each of the Market Participant’s Scheduled Generation Facilities **and** Non-Scheduled Generation Facilities for that ...”

9.9.2 – Please review all definitions for relevance and accuracy under this section as there appears to be numerous errors.

9.9.3 - Contracted Spinning serve should be Contracted Spinning Reserve

9.18.3.ix.4A Delete Non-Compliance Cost settlement.