

"Optimal's position has been supportive of the need to recognize costs and benefits related to ramping. A proposal to establish a ramp related charge would be consistent with market based payments for services provided. Optimal wishes to extend this issue to consider a subgroup of ramping related to ramp requirements due to changes on import and export volumes. This would open the prospects for loads to schedule reduced usage prior to the import change which could be considered equivalent to generation ramp and reward load for scheduling reduced usage for periods of 5 to 15 minutes. The rate would match the generator rate and could be paid for the number of 5 minute periods the load responds to the IESO request to remain off. The amount of load compensated would then be the amount to follow IESO directions to resume operations.

An added advantage to separating normal ramp and import/export ramp would be the allocation of these costs to the importer/exporters. The IESO should add this as a consideration for future Market Pricing sessions, even if loads are not compensated on the introduction of generation ramping.

Details of this arrangement were outlined in Optimal's submission on 12 X Ramp.

Robert Hunt
Market Development Advisor
Optimal Technologies (Canada) Inc.

July 17, 2006