

Non-Compliance Events and Conformance Monitoring

Revenue Metering Standing Committee &
Metering Service Providers Users Group

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Background

- Chapter 6 and appendices sets out the rights and obligations of market participants and metered market participants
- Chapter 6 and appendices sets out the rights, obligations and qualifications of metering service providers associated with the measurement of *energy*; the registration, provision, installation, commissioning, maintenance, repair, replacement, inspection, testing and audit of *metering installations*; and the provision, security and accuracy of *metering data* relating to the *real-time markets* or the *procurement markets*.

Background con't

- Chapter 3, section 6 sets forth the rules pursuant to which the *IESO* shall monitor, assess and enforce compliance with the *market rules*
- Enforcement is carried out by IESO's Market Assessment and Compliance Division (MACD)
 - market participant compliance with the market rules
- Metered market participant compliance with Chapter 6 may result from metering service providers actions or non-compliance event
 - MACD compliance actions are with the metered market participant

Metering Service Providers

Chapter 6 s.5 Metering Service Providers

5.1 Registration

- 5.1.1 No person may perform the activities required by this Chapter or by any policy or standard established by the *IESO* pursuant to this Chapter to be performed by a *metering service provider* unless that person has been registered by the *IESO* as a *metering service provider*.
- 5.1.2 No person shall be registered by the *IESO* as a *metering service provider* unless the person demonstrates to the satisfaction of the *IESO* that the person has the qualifications described in Appendix 6.4.
- 5.1.3 Any person including, but not limited to, a *market participant* or a *metered market participant*, that wishes to be registered by the *IESO* as a *metering service provider* shall file with the *IESO*:
 - 5.1.3.1 a completed application for registration as a *metering service provider* in such form as shall be established by the *IESO*;
 - 5.1.3.2 an executed agreement, in such form as shall be established by the *IESO*, pursuant to which the person agrees, among other matters, to be bound by and comply with the provisions of the *market rules* applicable to *metering service providers*; and
 - 5.1.3.3 the application fee established from time to time by the *IESO*, and approved by the *OEB*, to defray the costs of processing the application, conducting the systems and procedures tests and audits referred to in section 5.1.6 and conducting the review referred to in section 5.1.13.

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5.2 Activities and Standards for Metering Service Providers

5.2.1 The activities described in **section 1.3 of Appendix 6.1** shall be performed by a *metering service provider*.

5.2.2 Each *metering service provider* shall comply with all of the obligations imposed on *metering service providers* in Appendix 6.1 and in any policy or standard established by the *IESO* pursuant to this Chapter.

5.2.3 Each *metering service provider* shall meet all performance standards as set forth in the applicable *market manual* .

5.2.4 Where the provision of written meter-related materials or of post-registration familiarization and competency updating or upgrading to a *metering service provider* imposes a significant expense on the *IESO*, such documentation, assistance or training may be provided upon payment by the *metering service provider* of a reasonable fee.

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5.3 Revocation of Registration of Metering Service Providers

5.3.1 The *IESO* may revoke the registration of a *metering service provider* where the *metering service provider*:

5.3.1.1 has been found to be in breach of the *market rules* applicable to *metering service providers* on a persistent basis;

5.3.1.2 fails to meet the performance standards set forth in the applicable *market manual* on a consistent basis;

5.3.1.3 has been found to be in breach of a material provision of the agreement referred to in section 5.1.3.2; or

5.3.1.4 ceases to satisfy any material qualification for registration as a *metering service provider* or any material requirement imposed upon it as a condition of registration as a *metering service provider*.

Identifying Non-Compliances

- Non-compliance events can be identified thru:
 - Meter audits
 - Meter registration process
 - MTR process
 - Conformance monitoring process
 - NoD process
 - NCER/MACD process
 - Day to day IESO/MSP interaction
- MSP non-compliances determined once IESO and MSP have gathered and reviewed the facts:
 - IESO and MSP meeting
 - Records and Procedure Audit

Review of MSP Non-Compliance Events

- IESO will be reviewing details of recently identified MSP non-compliance events with the RMSC and MSP's
- Goal is to bring awareness to the MSP community to eliminate future non-compliance occurrences
- These are deemed non-compliance with a material provision of the Metering Service Provider Agreement
- Continued non-compliance on a persistent basis may lead to the revocation of registration of a metering service provider

MSP Response to Meter Trouble Reports

- Four similar non-compliance events identified
- MSP failed to provide action, follow up or response to MTR
- Unresolved MTR resulted in inaccurate settlement
 - Estimated data was not overwritten by actual data
 - Suspect data was not addressed in timely manner
- Non-compliance with Appendix 6.1 section 1.3.2.15
 - Each *metering service provider* shall, in respect of each *metering installation* in respect of which it is the *metering service provider* shall promptly respond to all trouble calls issued by the *IESO*.

Changes to a metering installation

- Two similar non-compliance events identified
- Changes to a metering installation were made without IESO authorization
 - Secondary cables were disconnected/reconnected during routine test
 - Metering cabinet was relocated
 - Commissioning tests were not done
- Resulting changes impacted accuracy of the meter installation which also impacted settlements

Changes to a metering installation (con't)

- Non-compliance with Chapter 6, section 9.3.1

Each *metered market participant* shall ensure that changes to equipment, parameters or settings within a *metering installation* in respect of which it is the *metered market participant* that may affect the collection, security or accuracy of any *metering data* recorded in that *metering installation* shall be:

9.3.1.1 authorised by the *IESO* prior to the change being made;

9.3.1.2 implemented by a *metering service provider* who shall obtain an end reading, ensure that the *metering data* recorded in the *metering installation* is transferred to the *metering database* prior to the change and obtain a start reading once the change has been completed; and

9.3.1.3 confirmed to the *IESO* within 1 *business day* after the change has been made.

Changes to a metering installation (con't)

- Non-compliance with Chapter 6, section 4.1.3

No *metering installation* shall be placed into service unless:

4.1.3.1 it has been commissioned in accordance with this Chapter and with any policy or standard established by the *IESO* pursuant to this Chapter;

Time Synchronization of the meter

- Two similar non-compliance events identified
- MSP configured meter to automatically time sync with external source
- Time synchronization had impact on metering data
- Non-compliance with chapter 6

8.1.3 Unless otherwise permitted by this Chapter or by any policy or standard established by the *IESO* pursuant to this Chapter, no *metered market participant* shall in any manner modify a *meter* within a *metering installation* in respect of which it is the *metered market participant*, any *metering data* recorded in the *metering installation* or the clock time of a *meter* within the *metering installation*.

11.2.2 The *IESO* shall synchronize each *meter* clock to within ± 5 seconds of eastern standard time in the Province of Ontario, or to such greater standard of accuracy as can be reasonably achieved by the *IESO*, at the time of commissioning of a *metering installation* and thereafter whenever it reads a *meter*.

Meter Password

- One non-compliance event identified for multiple instances
- Read/write/time sync password was provided to market participant and used to alter meter time clock
- Unauthorized time synchronization had impacted metering data for multiple metering installations

Meter Password (con't)

- Non-compliance with chapter 6

8.1.6 Each *metered market participant* shall ensure that electronic access to *metering data* recorded in a *metering installation* in respect of which it is the *metered market participant* shall only be provided where passwords in accordance with section 9.2 have been allocated. Otherwise, access to *metering data* shall be allowed only from the *metering database* and only by the *metered market participant* and the persons described in sections 8.1.5.1 to 8.1.5.5.

9.2.3 Subject to section 9.2.4, each *metering service provider* shall provide, in respect of each *metering installation* in respect of which it is the *metering service provider*, 'read-only' passwords to the *IESO*, to the *metered market participant* for the *metering installation*, to any *market participant* whose *settlement statement* is determined on the basis of the *metering installation's meter point*, and to any relevant *transmitter* or *distributor*, as the case may be depending upon the owner of the *facilities* to which the *facility* to which the *metering installation* relates is connected. Each *metering service provider* shall provide the *IESO* with a password allowing 'read plus synchronize time' access to the *meter* in each *metering installation* for which it is the *metering service provider*.

Summary

- MSP must have controls and resources in place to:
 - ensure timely and accurate response to MTR's;
 - ensure that changes to a metering installation are authorised by the IESO or confirmed to the IESO within 1 business day;
 - ensure that metering installations are commissioned before being placed in service;
 - ensure that meter time synchronization is maintained;
 - MSP to synchronize as part of commissioning
 - MSP to synchronize only if authorized via MTR
 - ensure electronic access to the meter installation is maintained; in accordance with market rules and IESO policy, standards and procedures

Summary (con't)

- Non-compliance events could impact one or more MSP performance measure
- MSP's encouraged to take away the 'lessons learned' and review their own internal controls