Waiver Application (General Process)

Submit this form by registered mail, courier or fax to the following address:

The IMO
655 Bay Street, Suite 410
P.O. Box 1
Toronto, ON M5G 2K4

Fax No.: (905) 212-3498

Subject: ***Waiver Application (General Process)***

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 information submitted will be assigned the appropriate confidentiality level upon receipt.

PART 1 – WAIVER APPLICANT - GENERAL INFORMATION

Organization Name: **O P G Inc. – Manitou Falls_Waiver #1** **Exemption # -01-1007**

Market Participant/Metering Service Provider No.(if applicable): _____

IMO Help Centre (IHC) Ticket No. (if applicable): N.A.

Address: 700 University Ave.

City/Town: Toronto

Province/State: Ontario

Postal/Zip Code: M5G 1X6

Country: Canada

Email Address: NA

Fax No.: NA

Main Contact

Name: Brian Gooder

Telephone No.: 416 592 7712

Fax No.: 416 592 8519

E-mail Address: brian.gooder@ontariopowergeneration.com

Web Site (URL): _____

PART 1 – GENERAL INFORMATION (CONTINUED)

Alternative Contact

Name: Wolfgang Burmester

Telephone No.: 416 592 7913 Fax No.: 416 592 8519

E-mail Address:wolfgang.burmester@ontariopowergeneration.com

PART 2 – INFORMATION ABOUT THE WAIVER APPLICATION

1.This waiver form is for the general waiver process. Are you also requesting an interim waiver?

☒ Yes ☐ No

2. Is this waiver application being submitted for existing facilities or equipment pursuant to section 14.12 of Chapter 1 of the Market Rules?

☒ Yes ☐ No

3. Please specify the duration for which you would like the waiver granted in days, months or years:

11 months

4. Are you requesting priority sequencing of your waiver application?

☐ Yes ☒ No

Please cite the Market Rules Section Number(s) to which this Waiver Application relates:	Please cite policy, standard or procedure to which this Waiver Application relates (including section number(s)):
Chapter 4, Appendix 4.15	

PART 3 – SUBMISSIONS IN SUPPORT OF WAIVER APPLICATION

Attach a waiver applicant's plan detailing:

- The manner and time within which the waiver applicant will become compliant with the obligation or standard to which the waiver application relates;
- The manner in which the waiver applicant proposes to modify its equipment or facilities or otherwise conduct its operations during the period of time for which the waiver would be in effect; and
- The waiver applicant's estimate of any costs that may be imposed on the IMO or on other Market Participants, if the waiver were granted;

The following submissions must be included, either as attachments or in the space provided below:

- The waiver applicant's assessment as to whether or not the waiver, if granted would:
  - Materially threaten the ability of the IMO to direct the operations and maintain the reliability of the IMO-controlled grid;
  - Materially threaten the ability of the IMO to ensure non-discriminatory access to the IMO-controlled grid;
  - Unless the waiver applicant is the IMO, materially affect the ability of the IMO to operate the IMO-administered markets in an efficient, competitive and reliable manner;
  - Provide the waiver applicant with an undue preference within the IMO-administered markets;
- An assessment of the costs or delay to the waiver applicant of complying with the obligation or standard to which the waiver application relates;
- Where the waiver applicant is the IMO, identification of the benefit to Market Participants of compliance with the obligation or standard to which the waiver application relates relative to the financial and other resources required to achieve compliance within such deadlines as may be applicable;
- Where the waiver applicant is the IMO, the manner in which it proposes to operate the IMO-administered markets or direct the operations and maintain the reliability of the IMO-controlled grid during the period in which the waiver would be in effect;
- Identification as to whether the facility or equipment that is the subject-matter of the waiver application:
  - Was in service or was returned to service on the date on which the obligation or standard to which the waiver application relates came into force;
  - Was ordered by the waiver applicant on or prior to the date on which the obligation or standard to which the waiver application relates came into force; or
  - Was in the process of construction on or prior to the date on which the obligation or standard to which the waiver application relates came into force.

Submission Information:

Manitou Falls Hydroelectric G.S. Waiver Plan:

Some of the monitored quantities specified in Appendix 4.15 are not available at this time.

The NET MW and MX analog quantities are only available from the Revenue Metering equipment installed on the high voltage line. These quantities will not be available to the IMO until suitable telecommunications equipment is installed.

Plan to operate with waiver in place:

Operations - Pre-market practices including operator monitoring and verbal messaging to the IMO will be used to overcome operational metering concerns.

Reliability of Grid/non-discriminatory access/impact on IMO-administered market/undue preference:

OPG's assessment of this application is that:

- It does not materially threaten the ability of the IMO to direct the operations and maintain the reliability of the IMO-controlled grid;
- It does not materially threaten the ability of the IMO to ensure non-discriminatory access to the IMO-controlled grid;
- It does not materially affect the ability of the IMO to operate the IMO-administered markets in an efficient, competitive and reliable manner;
- It does not provide OPG with an undue preference within the IMO-administered markets;
- No additional costs will be imposed on the IMO or other Market Participants through the approval of this waiver

Impact on OPG of waiver not being granted:

OPGI would not be able to continue to operate this equipment if the subject waiver was not granted.

PART 4 – SUMMARY OF SUBMISSIONS IN SUPPORT OF THE WAIVER APPLICATION

Please summarize the information provided in Part 3. This summary will be posted on the IMO public Web site.

Summary:

The waiver request is for a waiver from the obligation to supply information relating to the monitoring requirements of Chapter 4, Appendix 4.15.

The monitoring equipment at this facility existed before the new IMO controlled market was introduced. The equipment does not meet the new market rules and could not continue to function if a waiver was not granted . The waiver is required to operate the equipment at its current capability until suitable changes are implemented. The waiver is required for the following equipment: - operational metering.

PART 5 – SUPPORTING DOCUMENTATION TO BE ATTACHED BY WAIVER APPLICANT

Please list below all supporting documents attached to this waiver application.

1.
2.
3.
4
5.

PART 6 – CERTIFICATION

The undersigned hereby declares that the information contained in and submitted in support of this document is, to the best of the waiver applicant's knowledge, complete and accurate. By signature the waiver applicant agrees that information may be posted on the IMO public Web site in accordance with the provisions of *Market Manual 2: Market Administration – Part 2.2: Waiver Application and Assessment.*

Gord Haines Name (Please Print)	Section Manager – Electrical Equipment & Systems Title
Original Signed by Gord Haines Signature	 Date

PART 7 – FOR IMO USE ONLY

Received by:	Date Received:
Application Completion Date:	Waiver ID #
Date Requested:	