



Exemption Application

FOR IMO USE ONLY

Exemption ID #: _____

Submit this form by e-mail to: exemptions@theimo.com

Subject: *Exemption Application*

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 – EXEMPTION APPLICANT - GENERAL INFORMATION

Organization Name: <u>Cambridge & North Dumfries Hydro Inc.</u>	
Market Participant/Metering Service Provider No. (if applicable): _____	IMO Help Centre (IHC) Ticket No. (if applicable): _____
Address: <u>P.O. Box 1060, 1500 Bishop Street North</u>	
City/Town: <u>Cambridge</u>	Province/State: <u>ON</u>
Postal/Zip Code: <u>N1R 5X6</u>	Country: <u>Canada</u>
Fax No.: <u>519-621-0383</u>	
Email Address: _____	
Main Contact	
Name: <u>Dave Wilkinson</u>	
Telephone No.: <u>(519) 621-8405 ext: 2404</u>	Fax No.: <u>519-621-0383</u>
E-mail Address: <u>davew@camhydro.com</u>	
Web Site (URL): _____	
Alternative Contact	
Name: <u>Peter Hajek</u>	
Telephone No.: <u>(519) 621-8405 ext: 2405</u>	Fax No.: <u>519-621-0383</u>
E-mail Address: <u>phajek@camhydro.com</u>	

PART 2 – INFORMATION ABOUT THE EXEMPTION APPLICATION

1. Is this exemption application being submitted for existing facilities or equipment prior to market commencement date pursuant to Section 1.5.1 of the *Exemption Application and Assessment Procedure*?

☐ Yes

☒ No

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

Life of the Station.

Please cite the Market Rules section number(s) to which this Exemption Application relates:

Please cite policy, standard or procedure to which this Exemption Application relates (including section number(s)):

Wholesale Revenue Metering Standard -

Hardware - Section 7, part 7.4.1k

PART 3 – SUBMISSIONS IN SUPPORT OF EXEMPTION APPLICATION

Attach an exemption applicant's plan detailing:

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

The following submissions must be included, either below or as attachments:

(a) For exemption applications submitted prior to market opening for facilities/equipment in operation before or on April 17, 2000 and relating to the technical requirements of Market Rules contained in Appendix 2.2 (other than those for participant workstations or dispatch workstations), Chapter 4 (other than Sections 6.1.5 to 6.1.21), or the technical requirements set forth in Section 12 of Chapter 5:

- The exemption applicant's assessment as to whether or not the exemption, if granted would materially:
 - ♦ impact the ability of the IMO to direct the operations and maintain the reliability of the IMO-controlled grid;
 - ♦ affect the ability of the IMO to operate the IMO-administered markets in an efficient, competitive and reliable manner.
- The exemption applicant's assessment of whether the cost or delay to the exemption applicant of complying with the obligation or standard to which the exemption application relates is reasonable, having regard to the nature of the obligation or standard, the nature of the exemption application and the anticipated impact of non-compliance by the exemption applicant in terms of the elements referred to above.

(b) Additionally, for all other exemption applications:

- The exemption applicant's assessment as to whether or not the exemption, if granted would materially:
 - ♦ impact the ability of the IMO to ensure non-discriminatory access to the IMO-controlled grid;
 - ♦ increase costs of market participants; or
 - ♦ increase costs of the IMO;
- An assessment of whether the exemption would, if granted, give the exemption applicant an undue preference in the IMO-administered markets;
- Where the exemption applicant is the IMO, identification of the benefit to Market Participants of compliance with the obligation or standard to which the exemption application relates relative to the financial and other resources required to achieve compliance within such deadlines as may be applicable;
- Where the exemption 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

PART 3 – SUBMISSIONS IN SUPPORT OF EXEMPTION APPLICATION

IMO-controlled grid during the period in which the exemption would be in effect;

- Identification as to whether the facility or equipment that is the subject-matter of the exemption application:
 - ♦ was in service or was returned to service on the date on which the obligation or standard to which the exemption application relates came into force;
 - ♦ was ordered by the exemption applicant on or prior to the date on which the obligation or standard to which the exemption 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 exemption application relates came into force, and;
- An assessment of the capability of the owner of the facility to operate the facility consistent with the terms of the proposed exemption.

This is a long term exemption application and as such, the constructed facilities would remain as applied herein, for the the life of the station. This exemption would also become null and void if a major station upgrade facilitated the meter enclosure and instrument transformers being located closer together such that the IT cable route would not need to cross the main service roadway.

The design of this station was started more than a year ago and the un-obstructed route between the revenue metering instrument cables and the metering enclosure could not be prevented. Approximately one-quarter of the routing of the wiring between the metering instrument transformers and the revenue metering cabinet has been installed in a buried duct where it passes underneath the service road. It carries on to the switchgear and control building in a rigid galvanized steel pipe. (The reason for going underground is to pass underneath a service roadway). This roadway is used to deliver and remove heavy loads. (e.g. power transformers). This raceway system is dedicated for revenue metering wiring and for no other purpose. The IMO was been consulted in regards to this matter during the design and construction phases.

As far as maintaining assurance that the IT cables are not altered or tampered with, the site security measures consist of restricting access to Cambridge and North Dumfries Hydro Inc. personnel, authorized agents, and site access is monitored 24 hours a day.

Certified drawings are available to confirm the integrity of this metering installation. Hydro One, the MSP for this installation, has on file drawings which show the exact routing of the ductwork and conduit for these instrument transformer cables. Verbal direction from the IMO indicated that as long as the installation of the cable in the ductwork was professionally monitored and confirmed during installation, this exemption would be accepted.

There are no additional costs to the market place, the IMO, or other MMP's associated with this exemption. The cost of an alternative to comply with the IT cables being "routed in dedicated conduit, and shall be visually traceable" (from the Hardware Standard, section 7, part 7.4.1k) is in the order of \$22,000.

PART 3 – SUBMISSIONS IN SUPPORT OF EXEMPTION APPLICATION

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PART 4 – SUPPORTING DOCUMENTATION TO BE ATTACHED BY EXEMPTION APPLICANT

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

1. Exemption Applicant's Plan (must be attached)
- 2.
- 3.
- 4.
- 5.

PART 5 – CERTIFICATION

The exemption applicant hereby declares that the information contained in and submitted in support of this document is, to the best of the exemption applicant's knowledge, complete and accurate.

Dave Wilkinson

Name

Director - Information Technology, CNDHI

Title

PART 6 – CONFIDENTIALITY

- ☒ The exemption applicant agrees that information on this application may be posted in its entirety on the IMO Web site in accordance with the provisions of the *Exemption Application and Assessment Procedure*

OR

- ☐ The exemption applicant claims confidentiality over parts of the Exemption Application in accordance with Section 1.6.3 of the *Exemption Application and Assessment Procedure*. Parts of -this Exemption Application over which confidentiality is claimed are -highlighted. The balance of the information on this exemption application may be posted on the IMO Web site.

Dave Wilkinson

Name

Director - Information Technology, CNDHI

Title