## Kipling Complex HCL Exemption # 2 - R2

## Supporting Details & Plan

There is one remaining point of supply from the IMO controlled grid to the OPGI-owned Kipling Complex. The nature of the business in this complex is very unique & its services are called upon internationally. This metering point (MP) is referred to as the High Current Lab (HCL).

The Pump Test Complex (PTC) load was transferred from the 13.4KV - P19 feeder cables to the metered M17 feeder at Manby TS on Saturday July 26 at 1600 hours. This load transfer necessitated the need to update this exemption, referred to as Application # 01-1249 by the IMO.

The High Current Lab (HCL) has no wholesale revenue metering installation at the point of supply from the IMO controlled grid. Individual test records & historical data was used to estimate the load to conform to IMO's Market Manual 3: Metering Part 3.7: Totalization Table Registration. This High Current Lab supply point was connected to the tertiary of the power transformers from Manby TS many years prior to the Market Opening.

The nature of the HCL load is of very short intermittent duration, 6 to 30 cycles & rarely to 45 cycles. It operates ~3100 times a year & simulates electrical system faults! All other loads at the Kipling Complex are metered & registered either in the Wholesale or Retail Market Place. Low level loads 10 to 20MVA represent over 91% of the annual tests. Medium level loads 20-50MVA represent ~5.5% of the tests. High level loads of 50-75MVA are less than 3.5% of the tests. This brings the annual energy consumption of this very small load to a confidential cost.

The estimated load was calculated with a correction factor greater than two times the maximum load energy: thus, a benefit to the market place! Minimal additional costs to process flat rate energy & connection charges would be born onto the IMO.

It would require the most sophisticated IMO conforming meters to measure this unique type of load & the accuracies are not guaranteed past 3% harmonic distortion. For such a small energy load, OPGI would be looking a confidential cost & accuracy would always be suspect.

In light of the aforementioned, OPGI is seeking exemption to install & maintain a Wholesale Revenue metering point as per the Market Rules, Policies & Standards listed in Part 2 of the Exemption Application for the life of this facility. Currently, the hardware is not available to measure the energy of this type of short duration low load accurately & economically.

Kinectrics, the tenant of the OPGI-owned Kipling Complex is currently modifying its data acquisition systems to automatically maintain an electronic log of the HCL usage. This can be audited to ensure the estimated load is not exceeded to further protect the market place.