



Market Rule Amendment Written Submission

This form is used to provide comment on a *market rule* amendment under consideration by the *IESO*. Please complete all four sections of this form and submit the completed form by email or fax to the following:

Email Address: Rule.Amendments@ieso.ca
 Fax No.: (416) 506-2847 **Attention: Market Rules Group**
Subject: Market Rule Written Submission

All information submitted in this process will be used by the *IESO* 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 submitted information will be assigned the *confidentiality classification* of “Public” upon receipt. You should be aware that the *IESO* intends to *publish* this written submission.

Terms and acronyms used in this Form that are italicized have the meanings ascribed thereto in Chapter 11 of the *Market Rules*.

PART 1 – SUBMITTER’S INFORMATION

Please enter your organization and contact information in full.

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(if applicable) *Market Participant / Metering Service Provider* No.¹: 102007

Market Participant Class:
Transmitter/Distributor/Metering Service Provider

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PART 2 – MARKET RULE AMENDMENT REFERENCE

Type of Rule Amendment Being Commented on (please indicate with x):

Amendment Submission Proposed Rule Amendment Recommended Rule Amendment

MR Number: MR-00359: Generation Facility Requirements - Changes to Facilitate Connections

This *Market Rule* number is located on the “Current Market Rule Amendment” web page.

Date Relevant Amendment Submission, Proposed or Recommended Rule Amendment Posted for Comment: _____

¹ This number is a maximum of 12 characters and does not include any spaces or underscore.

PART 3 – COMMENTS ON RULE AMENDMENT

Provide your comments.

Hydro One has the following questions/concerns regarding MR359:

1. The requirements in Appendix 4.2 pertain to generation facilities with net output greater than 50MW, or a generation unit greater than 10MW. What is the IESO’s technical rationale behind these thresholds?
2. Would the proposed requirements of Appendix 4.2 be applicable to transmission stations that potentially inject power to the grid (with generation units >10MW connected downstream or with reverse power flow that is >50MW)?
3. The low-voltage ride through (LVRT) requirement allows generation facilities connected to the distribution system to remain in service (and not trip out) during transmission disturbances resulting in voltage dips at the points of common coupling (PCCs). While this requirement works well for transmission connected generation facilities including renewables where the collector circuits are at less than 50 kV, it is a concern to Load Distribution Companies (LDCs) with distributed generators on their feeders where the requirement is to ensure these generators trip for voltage dips to prevent islanding. The LVRT requirement for distributed connected generators on the LDC systems needs to be waved/reviewed or it needs to be as per the agreement between the LDC and the (DG) customer.

PART 4 – EXTERNAL CONSULTATION MEETING

If you believe that a special meeting of stakeholders would be necessary/desirable to discuss the issues raised by the rule amendment, please complete the following information:

External Stakeholdering meeting necessary/desirable (please indicate with x):

Reason(s) why you believe a meeting is necessary/desirable: