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## Market Rule Amendment Proposal

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### PART 1 – MARKET RULE INFORMATION

<b>Identification No.:</b> MR-00202-R01	
<b>Subject:</b> Metering Service Providers	
<b>Title:</b> Performance Standards for Metering Service Providers	
<b>Nature of proposal</b> (please indicate with X): ___ Alteration <u>X</u> Deletion ___ Addition	
<b>Chapter:</b> 6	<b>Appendix:</b> 6.6
<b>Sections:</b>	
<b>Sub-sections proposed for amending:</b>	

### PART 2 – PROPOSAL HISTORY

Issue	Reason for Issue	Issue Date
	Amendment submission reviewed by Technical Panel.	August 20, 2002
1	Amendment proposal submitted to Technical Panel	November 15, 2002
2	Recommended by Technical Panel and submitted for IMO-Board for approval	November 22, 2002

**Approved Amendment *Publication* Date:**

**Approved Amendment *Effective* Date:**

### PART 3 – EXPLANATION FOR PROPOSED AMENDMENT

Provide a brief description of the following:

- The reason for the proposed amendment and the impact the *IMO-administered markets* if the amendment is not made
- Alternative solutions considered
- The proposed amendment, how the amendment addresses the above reason and impact of the proposed amendment on the *IMO-administered markets*.

It is proposed to remove the performance standards for metering service providers from Appendix 6.6 of the market rules, revise them, and place them into Market Manual 3, Metering, part 3.9, Conformance Monitoring. Once the performance standards become reasonably well grounded through actual market experience and any further changes stakeholdered through relevant forums, they would be returned to the market rules through future rule amendment.

The IMO proposal of moving the performance standards to the market manual has been stakeholdered with the metering service providers (MSPs) who are in general agreement. The possibility exists that MSPs might want changes made quickly due to an unfair assessment of their performance as experience is gained with the application of the performance standards. They might not want to wait for the full rule amendment process to complete. MSPs see their livelihood as being directly influenced by their performance results. They want to be directly involved, and get any problems with the performance standards fixed quickly.

In addition to the MSP stakeholdering, the proposed move of the performance standards to the market manuals was also stakeholdered with the Metering Sub-Committee, which includes metered market participant representation. Again, there was no objection to the proposed move.

The MSPs noted that while they were in favour of moving the performance measures to a market manual, future changes to any performance measures must be stakeholdered with them. They did not want changes to their market without adequate consultation.

Two fundamental changes are proposed:

1. Remove the performance standards for MSPs from the market rules and add them to Market Manual 3.9, Conformance Monitoring. The purpose of this move is to allow changes to be made to the performance measures without requiring a market rule change. An example of this would be raising the communication target from 95% to 98% if experience warrants such a change. As changes are made to the market and improvements are made to the systems that support the market, these targets will need to be changed and will certainly evolve over a period of time. To ensure transparency of the Market Manual measures, stakeholdering will be required to obtain the agreement of MSPs and metered market participants (MMPs). Once the performance standards become reasonably well grounded through actual market experience, they will be returned to the market rules.
2. The current performance standards were developed on the basis of those needed in opening the market. Experience has shown that these need to be revised and made more specific to the settlement process now that the market is opened. As well there are a number of standards that are specific to market commencement and therefore are no longer relevant. Chapter 6, section 5.2.3 requires MSPs to meet the performance standards of Appendix 6.6. Chapter 6, section 13.1.1.8

requires the IMO to monitor their performance. This proposal is to change and modify the existing performance standards of Appendix 6.6.

The performance standards described within the draft market manual (see Attachment A, Market Manual 3.9, Conformance Monitoring) are simpler, clearer and more measurable, and in certain cases are less onerous than those presently in Appendix 6.6. Some performance standards have been deleted, as some are no longer required, while others have been made clearer or replaced.

The following is a section by section review and critique of the existing performance standards, cross-referenced to their replacement described in Attachment A. The performance standards of Attachment A have undergone development through the Revenue Metering Subcommittee of the Market Operations Standing Committee. The new performance standards are described in section B and explanatory notes are in section C.

The existing performance requirements per Appendix 6.6 are:

<b>For each MSP</b>	<b>Description</b>	<b>Requirement</b>
Section 1.2.1	% of metering installations registered by market commencement	100%
Section 1.2.2	% of metering installations registered on first attempt	95% or more
Section 1.3.1.1	# of MTRs issued for communications per calendar month	< 7 per 100 installations
Section 1.3.1.2	# of MTRs issued for metering data per calendar month	< 1 per 100 installations
Section 1.3.1.3	# of MTRs issued for component failure per calendar month	< 1 per 100 installations
Section 1.3.2	% of all MTRs related to metering data	2% or less
Section 1.3.3	% of MTRs resolved on first attempt to IMO's satisfaction per calendar month	95% or more
Section 1.4.1	% of audits per calendar month requiring no remedial action	95% or more
Section 1.4.2	% of audits per calendar month requiring remedial action on metering data	2% or less
Section 1.5.2	# of procedural errors that affect metering data accuracy	0

MTR – meter trouble report.

Considering each of these measures in turn:

**Section 1.2.1:** This is a one-time measure and should be removed from the enduring market. It is not meaningful anymore. What is important now is that ongoing registration errors are kept to a minimum; i.e. measure the number of registration errors. It is proposed to replace this measure by one that tracks the number of registration errors found per facility registration. (see 4) a) in Attachment A, proposed Market Manual 3.9, Conformance Monitoring).

**Section 1.2.2:** This existing measure is difficult to quantify and in reality is an efficiency measure with no impact on the market. What really matters are that installations are registered correctly before going into production. It is proposed to replace the existing measure by one that tracks registration errors found per facility registration. (see 4) a) in Attachment A).

**Section 1.3.1.1:** Communication between the IMO and the metering installation is a critical facet of settlements and as such should be measured. The existing measure tracks the number of MTRs issued for communications per calendar month and is a bulk measure of the IMO's ability to communicate with an MSPs metering installations. Unfortunately this measure does not accommodate MSPs with differing numbers of meters. It is also not a convenient measure with which to trouble shoot communication problems. The proposed replacement measure tracks the % of metering installations on a daily basis. This allows the IMO to track the effectiveness of an MSPs communications, plus it allows the IMO to identify problem installations to the day and the error code. It allows a finer resolution when troubleshooting. It is proposed the existing measure be replaced by one that measures

the % of metering installations that communicate with the IMO on a daily basis (see 1) a) in Attachment A).

**Section 1.3.1.2:** It is proposed that the number of meter trouble reports (MTRs) be retained as a measure, but with one minor change. Instead of measuring on a monthly basis, the measure would be a monthly average of the daily results (see 3) a) in Attachment A).

**Section 1.3.1.3:** To require MSPs to track all component failures to a predefined set of criteria is a significant amount of work and in the short term, not practical. Component failures are also not truly MSP performance related. Meter manufacturers bear this responsibility to a greater degree. It is proposed that the IMO measure the end result; i.e. is the metering installation working and did the IMO get valid metering data out of the metering installation. It is proposed that the existing measures be replaced by ones that measures the % of metering installations that have valid metering data on a daily basis (see 2) a) in Attachment A).

**Section 1.3.2:** The existing measure tracks the number of MTRs related to metering data on a monthly basis. This measure would indicate whether an MSP was not able to get valid metering data to the IMO. Under the new proposal, the measure would, in effect, be covered under performance standard 2) a) in Attachment A that tracks valid metering data and under performance standard 3) a) that covers MTRs issued – both on a daily basis. That is, the proposed measures would track how effective the MSP is at getting valid metering data back to the IMO – every day.

**Section 1.3.3:** The existing measure tracks the number of MTRs resolved on first attempt to the IMO's satisfaction per calendar month. There is no definition of “first attempt” or of what constitutes “to the IMO's satisfaction”. This measure is hard to define and impractical. The proposed measure is one that tracks the number of MTRs to which a reply has been received by the IMO within the required 2 business days (see 3) b) in Attachment A). This is a clearer measure of MSP responsiveness and resolution and can be easily tracked by the MTR system.

**Section 1.4.1:** The existing measure tracks audits per calendar month requiring no remedial action. This measure is retained in performance standard 5) a).

**Section 1.4.2:** This existing measure tracks audits per calendar month where remedial action on metering data is required. There is overlap between 1.4.1 and 1.4.2. One measure is sufficient and it is proposed this measure also be included in the new performance standard 5) a).

**Section 1.5.2:** This existing measure tracks the procedural errors that affect metering data accuracy. The concern with the existing measure is that there is no clear definition of a “procedural error” and apparently the measure does not capture the notion of compliance with the market rules. It is proposed that this measure be replaced by two new more appropriate and quantifiable measures. The proposed measures are performance standards 4) a) that tracks registration errors, which allows only one error per facility during the process of registration, and 4) b) that tracks the number of incidence of market rule non-compliance.

In addition, it is proposed to add a new measure for which there is no direct comparison to the existing set as follows:

Proposed performance standard 3) c) tracks the number of MTRs for which a Chapter 6, section 11 default estimate is applied. These estimates are applied as a direct result of the MSP not closing an

MTR. Considering the seriousness of such an estimate on the MMP, it is proposed to include such a performance measure in the new performance standards.

## Attachment A

### Market Manual 3: Metering Part 3.9: Conformance Monitoring

### Performance Standards and Measures for Metering Service Providers (MSP)

#### A. PERFORMANCE STANDARDS - GENERAL.

In accordance with the Market Rules Chapter 6 section 5.2.3, each metering service provider shall meet all performance standards as set forth by the IMO. This section of the manual covers the standards to which the MSPs have to comply as per the Market Rules and additional measures that will be tracked and results supplied to the MSPs as part of continuous improvement in the market.

#### B. PERFORMANCE STANDARDS FOR METERING SERVICE PROVIDERS.

- 1) Communication:
  - a) % of meters communicated with daily after multiple tries by the IMO, expected result is 95% daily, reported as follows:
    - i) monthly reports based on the average daily result, and
    - ii) monthly reports based on cumulative year to date results.
  
- 2) Metering Data
  - a) % of metering installations that have valid metering data, expected result is that the monthly average of the daily results is 95 %, reported as follows:
    - i) monthly reports based on the average of the daily result, and
    - ii) monthly reports based on cumulative year to date results.
  
- 3) Meter Trouble Reports (MTRs)
  - a) % of MTRs issued, expected result is that the monthly average of the daily results is 5%, reported as follows:
    - i) monthly reports based on the average daily result, and
    - ii) monthly reports based on cumulative year to date results.
  
  - b) % of MTRs for which a response is received by the IMO within two business days, expected result is 90% minimum, reported as follows:
    - i) a monthly reports based on the response result, and
    - ii) monthly reports based on cumulative year to date results

- c) # of MTRs where IMO imposes Chap 6 section 11.1.4A estimates, expected result is not more than 0.3% per month, reported as follows:
  - i) monthly report based on the percentage.
  
- 4) Market Rules, IMO Policy & Procedures
  - a) # of registration errors found per metering installation registered, expected result that the monthly average is not more than one registration error per 5 metering installations, reported as follows:
    - i) monthly report based on the total number of registration errors per metering installation registered.
  
  - b) # of non-compliance infractions, expected result is not more than one per month, reported as follows:
    - i) monthly report based on the total number of non-compliance infractions, and
    - ii) monthly reports based on cumulative year to date results.
  
- 5) Audits (as per App 6.6 section 1.4.1.)
  - a) % of metering installations requiring remedial action where metering data is affected is not more than 2%, reported as follows:
    - i) monthly report based on the total number of instances requiring remedial, and
    - ii) monthly reports based on cumulative year to date results

Note: Year to date results is for trending information only, they will not form part of the MSP performance standards.

### C. NOTES ON MSP PERFORMANCE STANDARDS

Where an exemption has been granted which affects an MSP's ability to meet, or relieves an MSP from the obligation to meet, certain requirements of the Market Rules or any IMO market manual, policy or guideline, this fact will be taken into account in measuring the MSP's compliance with the MSP Performance Standards. For example, where an exemption has been granted from market rule and market manual requirements relating to the provision of measurement error correction (mec) factors, the MSP's non-compliance with these requirements will not be considered for the purpose of measuring the MSP's compliance with the MSP Performance Standards.

#### Communication

1. The multiple tries by the IMO shall be confined to its normal calling cycle i.e. between midnight and 6:00 am.
2. The measure is a measure of whether the IMO communicates with the metering installation or not. It does not differentiate between the main and alternate meters. If either the main or alternate is reached, the performance measure is met.
3. For each MSP, the measure is the ratio of the number of metering installations successfully communicated with by the IMO, to the total number of metering installations registered by the MSP.
4. If the MSP can communicate with the meter but the IMO cannot - it is considered a failed communication.
5. The measure is dependent on whether the IMO in its calling strategy ensures sufficient diversity to allow a reasonable probability of connecting. This is implicit in the measure and the IMO

agrees to take this into account when applying the results of this measure. This accounting for the calling strategy however is at the sole discretion of the IMO.

#### Metering Data

1. Valid metering data is defined as metering data (defined as actual metering data) that has passed the IMO validation process as per Market Manual Validating, Estimating, and Editing (MDP-STD-0002). Substitution by alternate meter for the main meter is acceptable.
2. For each MSP, the measure is the ratio of the number of metering installations for which all data successfully pass validation, to the total number of metering installations successfully communicated with in the Communication measure above.
3. The measure is dependent on whether the IMO includes main/alternate energy comparisons under conditions of ramping, register rollover, voltage and current presence. Inclusion is at the sole discretion of the IMO.

#### MTRs - % of MTRs issued

1. MTRs are those issued to the MSP by the IMO using its trouble report system
2. For each MSP, the measure is the ratio of the total number of MTRs issued, to the total number of metering installations registered by the MSP.
3. The measure has elements of communication and validation in it, so comments made in those sections relate to this measure.

#### MTRs - # of MTRs for which a response is received within 2 BD

1. MTRs issued are those issued to the MSP by the IMO using its trouble report system.
2. For each MSP, the measure is the ratio of the total number of MTRs for which a response is received by the IMO's trouble report system within 2 BD, to the total number of MTRs issued over the calendar month.
3. "2 BD" starts from the time the MTR is issued by the IMO's trouble report system, ending at the same time 2 BD later.
4. MTR responses that are closed by the IMO will be counted. Responses that are not closed by the IMO and are rejected as unsatisfactory will have failed this measure.

#### MTRs - # of Chapter 6 section 11 estimates

1. Where an MSP fails to respond to a metering installation out of service, the IMO may under Chap 6 section 11 apply market favourable estimates to the MMP. Such estimates are only applied where the MTR remains open and where the IMO considers there is impact on one or more market participants.
2. For each MSP, the measure is the percentage of MTRs that has such estimates applied by the IMO within a calendar month, based on their total number of metering installations.

#### Market Rules, IMO Policy & Procedures

1. Registration errors include all errors found by the IMO, the MSP or the MMP.
2. For each MSP, the measure is the total number of errors found by the IMO in the registration information provided by the MSP. To be included, such errors have to directly affect metering data or are significant in the sole opinion of the IMO. Errors may be found by the IMO during the registration or after the installation is fully registered.
3. Any single error that affects more than one registration document or aspect of registration will count as a single error.

#### Non-compliance infractions



1. A non-compliance infraction includes a metering related obligation under the market rules of either the MMP or the MSP that has not been met.
2. For purposes of this measure, the IMO's sole opinion whether a non-compliance infraction has occurred will prevail.
3. For each MSP, the measure is the total number of non-compliance infractions that has occurred within the calendar month.
4. Where an exemption has been obtained to an obligation under the market rules, the non-compliance infraction will not be included in the total.

#### Audits

1. Metering data is affected when the metering data the IMO has collected as part of its normal operation has to be changed at any time as a result of an audit finding.
2. Work by the MSP on the metering installation to correct any deficiency that has affected metering data is considered remedial action in the sole opinion of the IMO.
3. For each MSP, this measure shall be the ratio of the number of instances of remedial action, to the number of installations registered
4. Audit errors under this measure shall not be double counted as part of registration errors
5. It is recognized that for the measure to be significant, a minimum number of audits per MSP should be completed.

#### **D. MSP CONTINUOUS IMPROVEMENT MEASURES**

As part of the overall improvement of metering in the market, and at the discretion of the MSP, the IMO will provide additional non-performance measures. These measures will not form part of the MDP performance, but will be provided to individual MSPs to manage and improve their operations. No target values are given at this time. Acceptable targets will be developed over time, as experience with these measures is gained.

##### 1. Communication

# of failed communications per meter, reported and averaged monthly. The main and alternate will be reported separately.

##### 2. VEE

# of validation errors per cause per meter reported and averaged monthly. The main and alternate will be reported separately.

##### 3. MTRs

% of MTRs issued per metering installation, reported and averaged monthly.

##### 4. MTRs

# of MTRs that reach Chapter 6 estimates, reported and average monthly. The measure will show all MTRs that reach Chap6 estimates in timing, whether they are significant to the market or not, and whether the IMO proceeds to apply the estimate or not.

##### 5. Audits

% of metering installation not requiring remedial action, reported and averaged monthly

## PART 4 – PROPOSED AMENDMENT

## ~~Appendix 6.6 – Performance Standards For Metering Service Providers~~

### ~~1.1 Introduction~~

~~1.1.1 This Appendix sets forth the standards against which the performance of *metering service providers* shall be monitored by the *IMO* for purposes of this Chapter.~~

### ~~1.2 Registration of Metering Installations~~

~~1.2.1 The performance standard for the successful completion by a *metering service provider* of the registration of *metering installations* shall be 100% in respect of *metering installations* attempted to be registered by the *metering service provider* prior to the *market commencement date*.~~

~~1.2.2 The performance standard for the successful completion by a *metering service provider* of the registration of *metering installations* on the first attempt shall be 95% or more in respect of *metering installations* attempted to be registered by the *metering service provider* in a given calendar month following the *market commencement date*. For purposes of this section, registration shall be successful on the first attempt if the *IMO* can access the *metering data* in the *metering installation* on its first attempt to do so and the *metering service provider* confirms that such *metering data* is accurate.~~

### ~~1.3 Trouble Calls~~

~~1.3.1 The performance standard for the number of trouble calls issued to a *metering service provider* by the *IMO* in a given calendar month, calculated on the basis of every 100 *metering installations* in respect of which the *metering service provider* acts as a *metering service provider*, shall:~~

~~1.3.1.1 be less than 7 with respect to the communications system associated with the *metering installations* in respect of which the *metering service provider* acts as a *metering service provider*;~~

~~1.3.1.2 be less than 1 with respect to the *metering data* recorded in the *metering installations* in respect of which the *metering service provider* acts as~~

## PART 4 – PROPOSED AMENDMENT

~~metering service provider; and~~

~~1.3.1.3 — be less than 1 with respect to any other component or facet of the metering installations in respect of which the metering service provider acts as a metering service provider.~~

~~1.3.2 — The performance standard for the percentage of all trouble calls issued to a metering service provider by the IMO in a given calendar month that relate to the metering data recorded in the metering installations for which that metering service provider acts as a metering service provider shall be 2% or less.~~

~~1.3.3 — The performance standard for the percentage of all trouble calls issued to a metering service provider by the IMO in a given calendar month that are resolved to the satisfaction of the IMO on the first attempt shall be 95% or more. For the purposes of this section, a trouble call:~~

~~1.3.3.1 — relating to metering data shall be resolved on the first attempt if the metering service provider has provided the IMO with accurate and complete information with which to adjust the metering data and the adjusted metering data is subsequently confirmed by the metering service provider as accurate without the need for further adjustment;~~

~~1.3.3.2 — relating to the communication system forming part of the metering installation shall be resolved on the first attempt if, upon receipt of the initial confirmation by the metering service provider that the matter has been resolved, the IMO can access the metering installation on an error-free basis on its first attempt to do so; and~~

~~1.3.3.3 — relating to any other aspect of a metering installation other than the metering data shall be resolved on the first attempt if the IMO is satisfied that the initial information provided by the metering service provider relating to resolution of the matter is complete and accurate and no further information is required to be requested by the IMO to confirm resolution of the matter.~~

## ~~1.4 — Audit~~

~~1.4.1 — The performance standard for the percentage of audits conducted in a given calendar month by the IMO on the metering installations in respect of which a metering service provider acts as metering service provider that do not reveal a need for any remedial action in respect of such metering installations shall be 95% or more.~~

~~1.4.2 — The performance standard for the percentage of audits conducted in a given calendar month by the IMO on the metering installations in respect of which a~~

**PART 4 – PROPOSED AMENDMENT**

~~metering service provider acts as metering service provider that reveal a need for remedial action in respect of the metering data recorded in such metering installations shall be 2% or less.~~

**1.5 Service Quality**

~~1.5.1 The performance standard for the number of procedural errors identified in respect of the metering installations in respect of which a metering service provider acts as metering service provider that affect the accuracy of the metering data recorded in such metering installations or that require the IMO to effect estimations of metering data when it would not otherwise be required to do so shall be 0.~~

**PART 5 – IMO BOARD COMMENTS**




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## Market Rule Amendment Proposal

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### PART 1 – MARKET RULE INFORMATION

<b>Identification No.:</b> MR-00202-R02	
<b>Subject:</b> Metering Service Providers	
<b>Title:</b> Performance Standards for Metering Service Providers	
<b>Nature of proposal</b> (please indicate with X): ___ Alteration <u>X</u> Deletion ___ Addition	
<b>Chapter:</b> 6	<b>Appendix:</b>
<b>Sections:</b> 5 and 13	
<b>Sub-sections proposed for amending:</b> 5.1.13.2, 5.2.3, 5.3.1.2 and 13.1.1.8.	

### PART 2 – PROPOSAL HISTORY SEE MR-00202-R01

Version	Reason for Issuing	Version Date

**Approved Amendment *Publication* Date:**

**Approved Amendment *Effective* Date:**

**PART 3 – EXPLANATION FOR PROPOSED AMENDMENT**

Provide a brief description of the following:

- The reason for the proposed amendment and the impact on the *IMO-administered markets* if the amendment is not made
- Alternative solutions considered
- The proposed amendment, how the amendment addresses the above reason and impact of the proposed amendment on the *IMO-administered markets*.

The changes contained herein are consequential to the removal of Appendix 6.6 from the market rules.

## PART 4 – PROPOSED AMENDMENT

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5.1.13 The *IMO* shall review with each applicant referred to in sections 5.1.7 and 5.1.10:

5.1.13.1 the procedures for the registration of *metering installations* described in this Chapter and in the procedures established by the *IMO* pursuant to section 6.1.2 of this Chapter; and

5.1.13.2 the performance standards for *metering service providers* set forth in [the applicable market manual Appendix 6.6](#).

...

5.2.3 Each *metering service provider* shall meet all performance standards as set forth in [the applicable market manual Appendix 6.6](#).

...

5.3.1 The *IMO* 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 Appendix 6.6](#) on a consistent basis;

...

## 13. Responsibilities of the IMO

13.1.1 The *IMO* shall:

...

13.1.1.8 monitor the performance of *metering service providers* against the performance standards set forth in the [applicable market manual Appendix 6.6](#);

**PART 5 – IMO BOARD COMMENTS**