



Market Rule Amendment Submission

Please complete the first four parts of this form and submit the completed form by email or fax to the following:

Email Address: Rule.Amendments@theIMO.com

Fax No.: (416) 506-2847 Attention: Market Rules Group

Subject: *Market Rule Amendment Submission*

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 submitted information will be assigned the confidentiality classification of "public" upon receipt. You should be aware that the *IMO* will *publish* this *amendment submission* if the Technical Panel determines it warrants consideration and may invite public comment.

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 contact information in full

Name: Jason Chee-Aloy	
(if applicable) Market Participant / Metering Service Provider No. ¹:	Market Participant Class: IMO Staff
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PART 2 – MARKET RULE AMENDMENT SUBMISSION INFORMATION

Subject: Metering
Title: Alternative Metering Installation Standards – Accuracy Requirements for Instrument Transformers
Nature of request (please indicate with X): <input checked="" type="checkbox"/> Alteration <input type="checkbox"/> Deletion <input type="checkbox"/> Addition <input type="checkbox"/> Clarification
Chapter: 6 Appendix: 6.2 Sections: 1.7
Sub-sections proposed for amending/clarifying : 1.7.1

¹ This field is restricted to a maximum of 12 characters and does not allow any spaces or underscore.

PART 2 – MARKET RULE AMENDMENT SUBMISSION INFORMATION

PART 3 – DESCRIPTION OF THE ISSUE

Provide a brief description of the issue and reason for the proposed amendment. If possible, provide a qualitative and quantitative assessment of the impacts of the issue on you and the *IMO-administered markets*. Include the Chapter and Section number of the relevant market rules.

It is proposed to amend section 1.7.1 of Appendix 6.2 to clarify the alternative metering installation standards for the accuracy requirements of instrument transformers.

All instrument transformers, for use in revenue metering, must be Measurement Canada approved. Approval has previously been afforded to instrument transformers that have accuracy ratings of 0.3, 0.6 and 1.2 ANSI class. As specified in section 4.1.1.3 of Chapter 6, the IMO standard for new installations is 0.3 ANSI.

Prior to market opening, it was decided to implement alternative metering installation standards (Appendix 6.2) that would allow existing instrument transformers (that are not 0.3 ANSI) to operate in the market. The reasons for this approach were:

- The cost of requiring all participants to change their instrument transformers that did not have 0.3 ANSI was significant;
- A significant number of participants had 0.6 ANSI instrument transformers that were already in service; and
- Applying a correction factor would hold the market harmless.

The alternative metering installation standards are based on the Wholesale Revenue Metering Standard – Hardware. However, the alternative metering installation standards disallow many existing instrument transformers (i.e. those with 0.6 ANSI). This was not the intent of the alternate standard. It should have allowed non 0.3 ANSI instrument transformers to enter the market provided they had correction factors to hold the market harmless.

In comparison, the Hardware standard under section 6.12.5 allows the use of non 0.3 ANSI instrument transformers in existing installations. This position should have been carried through to the market rules.

Therefore, the proposed rule change will remove this limitation and allow instrument transformers that have:

- Measurement Canada approval;
- Proof of accuracy; and
- Correction factors for instrument transformers greater than 0.3 ANSI accuracy.

The proposed rule amendment has been stakeholdered with the members of the Metering Service Providers User Group. The majority agreed with the changes – there was one single exception who was concerned that the error correction factor may incorrectly bias a metering installation and charge more than what is actually being metered. This metering service provider believed all instrument transformers should be 0.3 ANSI.

PART 2 – MARKET RULE AMENDMENT SUBMISSION INFORMATION

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PART 4 – PROPOSAL (BY SUBMITTER)

Provide your proposed amendment. If possible, provide suggested wording of proposed amendment.

Amend section 1.7.1 of Appendix 6.2 to more accurately reflect to alternative metering installation standards for accuracy requirements of instrument transformers.

PART 5 – FOR IMO USE ONLY

Technical Panel Decision on Rule Amendment Submission	
MR number: MR-00205-Q00	
Date submitted to Technical Panel: August 14, 2002	
Accepted by Technical Panel as: <input checked="" type="checkbox"/> General <input type="checkbox"/> Urgent <input type="checkbox"/> Minor (please indicate with X)	Date: August 20, 2002
Criteria for acceptance: Identifies an error or inconsistency within the market rules; and, identifies ambiguity or confusion within the rules that cause interpretation confusion and leads to poor coordination of implementation or to future disputes	
Priority: Medium	
Criteria for assigning priority: Although the error applies to the majority of existing metering installations, i.e. it is pervasive, the impact is not significant.	
Not accepted (please indicate with X):	
Clarification/interpretation required (please indicate with X):	
Technical Panel minutes reference: IMOTP 110-1	
Technical Panel Comments:	
In the view of the Technical Panel, the issues identified in this amendment submission warrant further consideration.	
The Technical Panel is not requesting stakeholder comments at this time as these issues have been stakeholdered and endorsed at the Metering Service Providers User Group.	