



## 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](mailto: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

<b>Name:</b> Darren Finkbeiner	
(if applicable) <i>Market Participant / Metering Service Provider No.</i> <sup>1</sup> :	<b>Market Participant Class:</b> IMO Staff
<b>Telephone:</b> 416-506-2801	<b>Fax:</b> 416-506-2847
<b>Email Address:</b> <a href="mailto:rule.amendments@theimo.com">rule.amendments@theimo.com</a>	

### PART 2 – MARKET RULE AMENDMENT SUBMISSION INFORMATION

<b>Subject:</b> Energy Offers and Bids & Operating Reserve Offers		
<b>Title:</b> Intertie Transaction Offers/Bids to the whole MW.		
<b>Nature of request (please indicate with X):</b> <input checked="" type="checkbox"/> <b>Alteration</b> <input type="checkbox"/> <b>Deletion</b> <input type="checkbox"/> <b>Addition</b> <input type="checkbox"/> <b>Clarification</b>		
<b>Chapter:</b> 7	<b>Appendix:</b>	<b>Sections:</b> 3.5 & 3.6
<b>Sub-sections proposed for amending/clarifying :</b> 3.5.3 & 3.6.2		

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

**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.

Currently the Market Rules allow for boundary entity dispatch data quantities to be expressed in MW (or MWh/hour) to one decimal place. This fractional dispatch data does not coincide with current industry practice where interjurisdictional transactions are scheduled to the whole MW and not to the tenth of a MW. In fact, the system which supports the current North American Electric reliability Council (NERC) transaction tagging requirements, known as E-Tag 1.7, does not permit the submission of a NERC tag to anything but whole MW. The proposed rule amendments bring the IMO market rules into alignment with industry practice.

It should be noted however that the IMO’s scheduling system may attempt to schedule interchange transactions to the tenth of a MW. This possible conflict has been addressed and the process for dealing with such situations is currently articulated in the IMO Market Manual MM4.3 – Real-Time Scheduling of the Physical Markets, Section 1.8.2.

**PART 4 – PROPOSAL (BY SUBMITTER)**

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

Require that the quantities specified in energy offers and bids from a boundary entity and operating reserve offers from a boundary entity, be expressed in whole MW.

**PART 5 – FOR IMO USE ONLY**

***Technical Panel Decision on Rule Amendment Submission***

**MR number:**

**Date submitted to *Technical Panel*:**

Accepted by <i>Technical Panel</i> as: <input type="checkbox"/> General <input type="checkbox"/> Urgent <input type="checkbox"/> Minor (please indicate with X)	<b>Date:</b>
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**Criteria for acceptance:**

**PART 5 – FOR *IMO* USE ONLY**

<b>Priority:</b>
<b>Criteria for assigning priority:</b>
<b>Not accepted (please indicate with X):</b>
<b>Clarification/interpretation required (please indicate with X):</b>
<b><i>Technical Panel</i> minutes reference:</b>
<b><i>Technical Panel</i> Comments:</b>