



## Market Rule Amendment Submission

This form is used to request an amendment to, or clarification of, the *Market Rules*. 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: IMO Staff</b>	
(if applicable) <i>Market Participant / Metering Service Provider No.</i> <sup>1</sup> :	<i>Market Participant Class:</i>
<b>Telephone: (416) 506-2801</b>	<b>Fax: (416) 506-2847</b>
<b>Email Address: rule.amendments@theimo.com</b>	

### PART 2 – MARKET RULE AMENDMENT SUBMISSION INFORMATION

<b>Subject: Functional Deferral # 8 – Treatment of Dispatch Deviation as Increase in Non-Dispatchable Load</b>
<b>Title: Extension of Functional Deferral # 8 – Treatment of Dispatch Deviation as Increase in Non-Dispatchable Load</b>
<b>Nature of request (please indicate with X): <u> X </u> Alteration <u> </u> Deletion <u> </u> Addition Clarification</b>

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

**PART 2 – MARKET RULE AMENDMENT SUBMISSION INFORMATION**

<b>Chapter: 7</b>	<b>Appendix:</b>	<b>Sections:</b>
<b>Sub-sections proposed for amending/clarifying :4.4.3A, 6.4.2A, 7.5.5A</b>		
<b>Appendix 7.5 Sections 7.3.2, 8.4.3</b>		

**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.

The current market rules provide that the IMO will not develop the tools to adjust the demand in the unconstrained market schedule so as to account for the amounts by which generators and dispatchable loads deviate from their scheduled quantities until 7 months after market commencement (section 4.4.3A of Chapter 7). The deferred functionality has the identifier FD-08.

The IMO Board at its April 2002 meeting approved extending the deferral of this functionality until such time as locational pricing is implemented. Through an oversight the market rules were not aligned to match the Board’s decision. Therefore, there is a need to revise the market rules to reflect the Board’s decision.

In a uniform pricing regime, the dispatch deviation of a given facility and its impact on the uniform price is likely to be immaterial. In addition, as uniform pricing calculations look at the entire market, dispatch deviations of many facilities would be expected to be independent and cancel each other out, to some extent.

In a locational pricing regime, the dispatch deviation of a given facility could have a significant impact on the price at that location. It is appropriate that as long as uniform pricing is used in Ontario, there is little value in implementing the functionality. Should the market implement locational pricing that would be the appropriate time to implement this functionality.

**PART 4 – PROPOSAL (BY SUBMITTER)**

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

<p>Revise the market rules in the sections indicated in sections 4.4.3A, 6.4.2A, &amp; 7.5.5A of Chapter 7 and sections 7.3.2 &amp; 8.4.3 of Appendix 7.5 to reflect that this functionality shall be deferred until such time that IMO-administered markets implement locational pricing.</p>
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**PART 5 – FOR *IMO* USE ONLY**

<b>Technical Panel Decision on Rule Amendment Submission</b>	
<b>MR number: MR-00218-Q00</b>	
<b>Date submitted to <i>Technical Panel</i>: February 25, 2003</b>	
<b>Accepted by <i>Technical Panel</i> as: <u>X</u> General ___ Urgent                  Minor                  (please indicate with X)</b>	<b>Date: February 25, 2003</b>
<b>Criteria for acceptance: f) It identifies ambiguity or confusion within the rules that cause interpretation confusion and leads to poor coordination of implementation or to future disputes.</b>	
<b>Priority: High</b>	
<b>Criteria for assigning priority: d) Practical consequences – implementing the market rule amendment would allow the market rules to properly reflect an IMO Board decision to defer this functionality.</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: IMOTP 122-1</b>	
<b><i>Technical Panel</i> Comments:</b>	