



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

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: IMO Staff	
(if applicable) <i>Market Participant / Metering Service Provider No.</i> ¹ :	Market Participant Class:
Telephone: (416) 506-2842	Fax: 416 506-2847
Email Address: rule.amendments@theIMO.com	

PART 2 – MARKET RULE AMENDMENT SUBMISSION INFORMATION

Subject: Metering Installations – Seal Expiry Recommendations		
Title: Seal Expiry – Metering Installations		
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 (six)	Appendix: 6.2	Sections: Various
Sub-sections proposed for amending/clarifying : Various		

¹ This number is a maximum of 12 characters and does not include 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.

During 2003, approximately 380 metering installations will seal expire. In accordance with the requirements of Measurement Canada, these meters will have to be replaced with newly sealed meters. Doing nothing and just leaving the meters in service is not an option.

The Market Rules also address the actions to be taken at seal expiry i.e. meters that seal expire have to be replaced with two conforming meters - main & alternate. In addition, a number of improvements such as compensation factors for errors or inaccuracies in the metering installation must be given to the IMO for adjustment of the metering data. The instrument transformers (ITs) may remain (in most but not all cases) but the IMO has to be told how to adjust the data for any inaccuracies. The issue is that the cost of meeting the *Market Rules* (at seal expiry) during this time of restraint is too high.

In response, the IMO submitted this issue (as well as some other issues that directly affect cost) to the stakeholder consultation process.

The proposed *Market Rule* amendments are as a result of this consultation.

There are four distinct areas of rule amendment:

1. **Seal Expiry:** The proposed seal expiry amendments will allow the *metered market participant* (MMP) to choose the best option for their particular situation, while continuing to move the market in a direction that improves the overall accuracy and reliability of the metering. The proposed amendments will allow the MMP to comply with the Market Rules as presently written or choose a lesser standard to save costs. It is further proposed that IMO conforming meters (from the Conforming Meter List) must be used in all cases, thereby moving the market forward in terms of accuracy and reliability. The proposed options are as follows:

New installations

It is recommended that all new installations continue to comply with the *Market Rules* as they are presently written.

Existing installations

For existing installations (installations that were in-service on the date of coming into force of Chapter 6 section 4.4 including those registered under the *Market Rules* Alternative Metering Installation Standards) it is proposed that the MMP select from one of the following options:

- a) The MMP can bring the installation into full compliance with the *Market Rules* (as presently written) as if it were a new installation.
- b) The MMP can remain with the *Market Rules* (as presently written) and continue with the Alternative Metering Installation Standards complying with the conditions as laid out in Appendix 6.2 for seal expiry.
- c) The MMP can keep their existing metering installation but replace the seal expired meter with main and alternate meters from the Conforming Meter List. Some conditions apply. This option will require a market rule amendment.
- d) The MMP can keep their existing metering installation but replace the seal expired meter with a single main meter from the Conforming Meter List. Some conditions apply. This option will require a market rule amendment.

PART 3 – DESCRIPTION OF THE ISSUE

It is proposed that Options c) and d) above remain in effect until 30 April 2006 for all metering installations that seal expire during that time based on the seal expiry date at the time of market commencement. Meters with seal expiry dates after 1 May 2006 would be required to comply with the *Market Rules* for new installations or the *Market Rules* for Alternative Metering Installations Standards

2. **Substantial Upgrade or Refurbishment:** Meters registered under the Alternative Metering Installation Standard Chapter 6 Appendix 6.2 lose their registration under this standard should the MMP make changes that in the IMO's opinion constitutes "substantial upgrade or refurbishment". Loss of registration under this standard requires the MMP to bring the metering installation into full compliance with the Market Rules as is if it were a new installation. There are several instances of "substantial upgrade or refurbishment" in the Alternative Metering Installation Standard and any one of them can cause the loss of registration. An example of this is secondary cabling – should the MMP change the secondary cabling for reason the IMO considers substantial, the metering installation has to be brought into full compliance.

It is proposed that the *Market Rules* be changed such that the MMP can make changes without losing its registration. The MMP would be required to bring that aspect of the metering installation to be changed into full compliance, but not the whole installation. Considering the example of the secondary cabling above – the secondary cabling would have to be brought into full compliance, but not the rest of the installation and it would continue to be registered under the Alternative Metering Installation Standard. This proposal would not apply to non-Blondel installations where the error is greater than 3% - these must be brought into full compliance. The proposed changes will require *Market Rule* amendments to Appendix 6.2. The intent of this change is to reduce costs by reducing the impact on an MMP of a substantial upgrade or refurbishment.

3. **IT replacement time allowed:** It is proposed to increase the time allowed for the replacement of an instrument transformer (IT) to 12 weeks from 8 weeks. Increasing the time allowed will reduce inventory costs. Changing to 12 weeks will require an amendment to Chapter 6 section 11.1.2.2.
4. **IT proof of accuracy:** Metering installations registered under the Alternative Metering Installation Standard (Ch 6 Appendix 6.2 section 1.7.1) are at present required to have factory test cards as proof of accuracy of the instrument transformers (ITs). If the test cards are not available, the MMP is obliged to test the accuracy on-site or produce manufacturer's records showing the accuracy of an identical unit. It is proposed that this be changed to allow the use of additional sources of accuracy information as follows:
 - i) Accept IT nameplate data as proof of accuracy, where the nameplate contains the required ANSI accuracy information and is affixed to the IT.
 - ii) Accept Measurement Canada type approval information as proof of accuracy of the ITs, where such approval contains the required ANSI accuracy information.

Accepting IT nameplate data and Measurement Canada information as proof will require a market rule amendment. The benefit of allowing these proofs is that the MMP will not have to carry out on-site instrument transformer accuracy tests at an estimated \$15,000 to \$20,000 per set of 3 ITs.

PART 4 – PROPOSAL (BY SUBMITTER)

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

Seal Expiry: Amendments to Chapter 6 Appendix 6.2 as follows:

- Sections 1.1A to allow to the continued use of a standalone meter
- Section 1.10 to allow the MMP to continue with their present enclosure arrangements

Substantial Upgrade: Amendments to Chapter 6 Appendix 6.2 as follows:

- Section 1.2 to allow the MMP to upgrade their installation with respect to non-Blondel compliance without having to upgrade the rest of the installation (except where the error exceeds 3%)
- Section 1.6 to allow the MMP to change their installation with respect to power switching, without having to upgrade the rest of the installation
- Section 1.7 to allow the MMP to upgrade their instrument transformers without having to upgrade the rest of the installation
- Section 1.8 to allow the MMP to upgrade their secondary cabling without having to upgrade the rest of the installation
- Section 1.9 to allow the MMP to remove any parallel current transformers without having to upgrade the rest of the installation
- Section 1.11 to allow the MMP to upgrade with their present IT primary connection point without having to upgrade the rest of the installation
- Section 1.12 to allow the MMP to upgrade their IT primary cable without having to upgrade the rest of the installation
- Section 1.13 to allow the MMP to upgrade their ITs relating to burden without having to upgrade the rest of the installation

IT Replacement Time Allowed: Amendment to Chapter 6

- Section 11.1.2.2 change the 8 weeks to 12 weeks

IT Proof of Accuracy: Amendment to Chapter 6 Appendix 6.2

- Section 1.7.1 add the acceptance of IT nameplate data and Measurement Canada type approval information.

PART 5 – FOR *IMO* USE ONLY

Technical Panel Decision on Rule Amendment Submission	
MR number: MR-00228-Q00	
Date submitted to Technical Panel: March 28, 2003	
Accepted by Technical Panel as: <input checked="" type="checkbox"/> General <input type="checkbox"/> Urgent <input type="checkbox"/> Minor (please indicate with X)	Date: April 1, 2003
Criteria for acceptance: Identifies ways to simplify the market and/or reduce participant or IMO costs	
Priority: High	
Criteria for assigning priority: The issue is pervasive and immediate in its affect on metered market participants.	
Not accepted (please indicate with X):	
Clarification/interpretation required (please indicate with X):	
Technical Panel minutes reference: IMOTP 124-1	
Technical Panel Comments: It would help if the rationale within the rule amendment proposal include estimates of the costs to metered market participants of the upgrades due to seal expiry, and also an estimate of the misallocation of revenue if the meters are not upgraded upon seal expiry.	