



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 : N/A	Market Participant Class: N/A
Telephone: 416 506-2801	Fax: 416 506-2847
Email Address: rule.amendments@theimo.com	

PART 2 – MARKET RULE AMENDMENT SUBMISSION INFORMATION

Subject: Wholesale Revenue Metering
Title: Extension of Registration of Metering Installations Granted Temporary Dispensation by Measurement Canada
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: Sections:
Sub-sections proposed for amending/clarifying : 4.4

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.

In the IMO-administered markets there is a large number of legacy revenue metering installations that are registered under an alternative metering installation standards (Appendix 6.2 of the market rules). In 2003, the seals expired on a significant number of these legacy revenue metering installations. The market rules currently specify that the registration of these metering installation also expires when the seals expire (section 4.4.5 of Chapter 6). The market rules also specify that market settlements are on the basis of registered metering installations (section 6.1.1 of Chapter 6).

The transitional metering service provider for these metering installations requested, and received from Measurement Canada, temporary dispensation regarding the use of these metering installations for the “the continued use of the existing WRMI (wholesale revenue metering installations) in 2004 for settlement purposes...”¹. This temporary dispensation applies to 383 devices (meters and recorders).

For the continued efficient settlement of the IMO-administered markets and to align the market rules with the Measurement Canada temporary dispensation, rule amendments are necessary to extend the registration of the specified metering installations so that the metering installations can continue to be used for settlements.

PART 4 – PROPOSAL (BY SUBMITTER)

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

Rule amendments should extend the registration of these metering installations beyond the seal expiry period, but place a sunset on that registration extension of December 31, 2004. This sunset is the same as the sunset of the Measurement Canada temporary dispensation. By doing so, these metering installations could be used for settlement purposes.

¹ Letter from Alan E. Johnston, Measurement Canada to Mr. Dave Barrie, Hydro One, “Temporary Dispensation for Meters and Recorders with Seals Expiring in 2003”, October 14, 2003.

PART 5 – FOR IMO USE ONLY

Technical Panel Decision on Rule Amendment Submission	
MR number: MR-00249	
Date submitted to Technical Panel: 5 Nov 03	
Accepted by Technical Panel as: <input checked="" type="checkbox"/> General <input type="checkbox"/> Urgent <input type="checkbox"/> Minor (please indicate with X)	Date: 11 Nov 03
Criteria for acceptance: <ol style="list-style-type: none"> 1. It identifies ways to simplify the market and/or reduce market participant or IMO costs. Not allowing these metering installations to be used for settlement purposes would require significant and potentially costly “work-arounds” to effect the settlement of the IMO-administered markets. Alternatively, MMPs would face significant costs to bring the subject metering installations into full compliance by the end of 2003. 2. It identifies an error or inconsistency between the market rules and applicable laws, regulations, codes, OEB licences etc. The market rules, by not allowing the use of the subject metering installations for settlement purposes, are inconsistent with the Measurement Canada temporary dispensation. 	
Priority: High	
Criteria for assigning priority: The issue raised is very pervasive. The Measurement Canada temporary dispensation covers 383 devices. Efficient settlement of the IMO-administered markets would not be possible without using these devices.	
Not accepted (please indicate with X):	
Clarification/interpretation required (please indicate with X):	
Technical Panel minutes reference: IMOTP 133-1	
Technical Panel Comments: The Technical Panel expressed concern over two issues. The first issue is the treatment of metered market participant non-compliance with respect to the obligations that will remain upon seal expiry for their metering installations. The second issues is with respect to the market’s need for assurance that the eligible metering installations to which the temporary dispensation applies will be adequately maintained and provide accurate data for settlement purposes. The IMO will be working with metered market participants and metering service providers over the next few weeks to address these issues, and additional information may be posted on these issues.	