



Market Rule Amendment Written Submission

This form is used to provide comment on a market rule amendment under consideration by the IMO. Please complete all four sections 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 Written 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* intends to *publish* this written submission.

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 your organization and contact information in full

Name: Brantford Power Inc. (Peter Hajek, P.Eng.)	
<i>(If applicable) Market Participant / Metering Service Provider No. ¹: <u>102321</u></i>	Market Participant Class: LDC, Load Only
Telephone: 519-759-4222 x3287	Fax: 519-753-6032
Email Address: phajek@brantford.ca	

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

PART 2 – MARKET RULE AMENDMENT REFERENCE

<p>Type of Rule Amendment being commented on (please indicate with X):</p> <p><u> </u> <i>Amendment Submission</i> <u> X </u> Proposed Rule Amendment <u> </u> Recommended Rule Amendment</p>
<p>MR-# <u> 00250-R00 </u></p> <p>This Market Rule number is located on the “Current Market Rule Amendment” web page.</p>
<p>Date relevant <i>Amendment Submission</i>, Proposed or Recommended Rule Amendment posted for comment: 2004-02-24</p>

PART 3 – COMMENTS ON RULE AMENDMENT

Provide your comments.

<p>Brantford Power Inc. agrees with these relaxed metering requirements for Embedded Generators between 1 and 20MW, subject to the following comments.</p> <ol style="list-style-type: none"> 1) The method for calculating the reconciliation amount should be universal. It should take into account the timing of the embedded generator output. Would it have attracted Transmission Service charges coincident to either/both the Market or transmission customer’s peak demand? That is, would the inclusion of the embedded generator output contributed to a higher billable demand by the IMO? 2) Include language that indicates that the transmission customer will determine the type/level of metering they require the embedded generator to install. Only stating that “4.5.2.1 the embedded generator can register the meter point without a wholesale physical meter” leaves the type/level of metering open to interpretation by the embedded generator. We would like to suggest additional wording, such as, “...without a wholesale physical meter, but with a physical meter prescribed by the transmission customer”. A physical meter will be needed for embedded generators that are not registered market participants (embedded retail generator) as the energy still has to be metered for retail settlement purposes and adjustments to the reconciliation amount. 3) As the current metering standard is written as part of Hydro One’s Transmission Rate structure, it may be necessary to have their ‘Transmission Rate Schedule: Terms and Conditions’ amended accordingly via the Ontario Energy Board, corresponding to the timing of this proposed rule amendment coming into effect.
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PART 3 – COMMENTS ON RULE AMENDMENT

PART 4 – EXTERNAL CONSULTATION MEETING

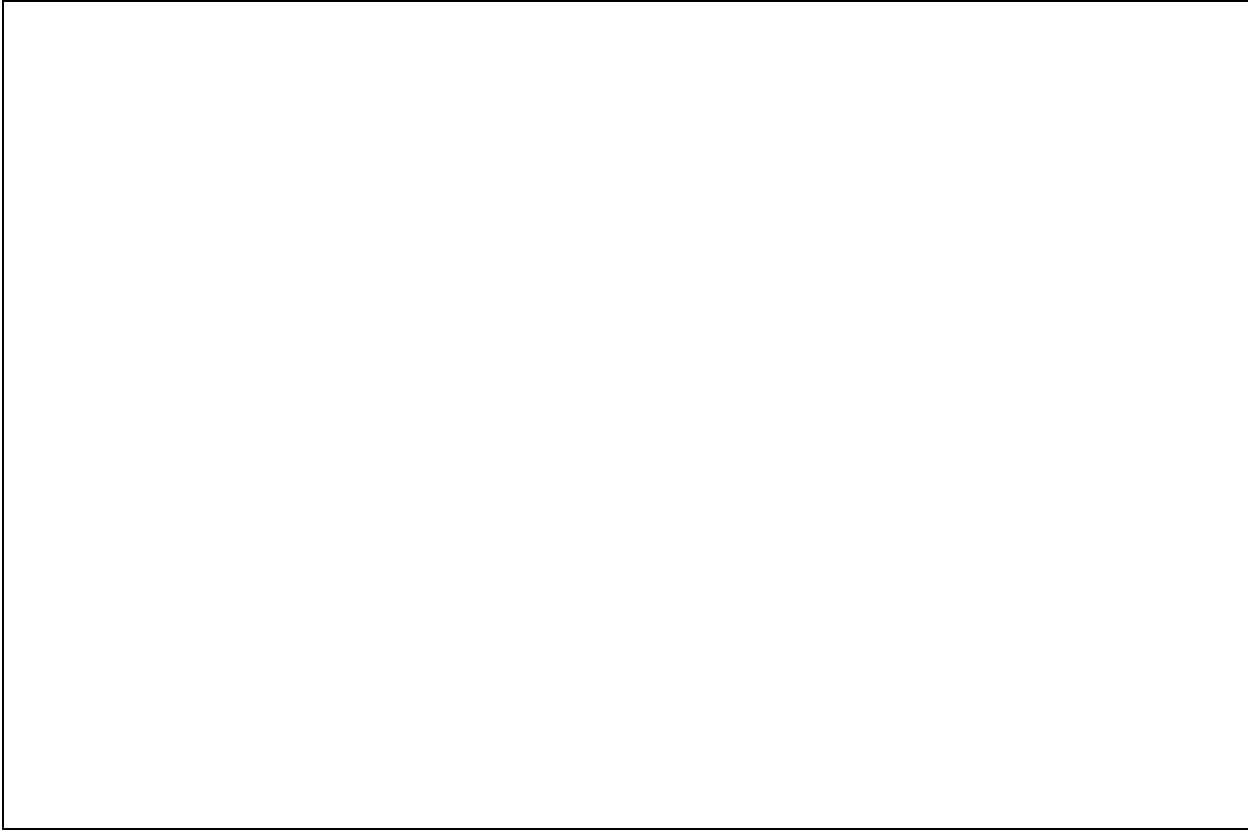
If you believe that a special meeting of stakeholders would be necessary/desirable to discuss the issues raised by the rule amendment, please complete the following information:

External Stakeholdering meeting necessary/desirable (please indicate with X):

Reason(s) why you believe a meeting is necessary/desirable:

We believe a meeting is necessary/desirable to ensure adequate transmission customer representation in understanding proposed reconciliation methods.

PART 4 – EXTERNAL CONSULTATION MEETING

A large, empty rectangular box with a thin black border, occupying the central portion of the page. It is intended for recording the details of an external consultation meeting.