



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: Peter Ronson	
<i>(If applicable) Market Participant / Metering Service Provider No. ¹:</i>	Market Participant Class: self-scheduling embedded generator
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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: Feb 24, 2004</p>

PART 3 – COMMENTS ON RULE AMENDMENT

Provide your comments.

I agree that the current requirement for IMO compliant metering does place an increased and unnecessary financial burden on the generation facility owner and the host transmission customer (the LDC’s).

From the generator facility owner’s perspective, installing IMO metering generally provides no direct benefit. Depending on the physical situation, there is almost always revenue-grade metering installed already on the physical generator(s), and a revenue-grade metering installation suitable to the LDC installed at the point of connection. Installing IMO metering will often duplicate metering information already available. The marginal increase in level of accuracy and redundancy of IMO compliant metering is not worth the added cost.

If we were talking about large generators (greater than 20 MW as suggested in the proposal), redundant and highly accurate metering would be installed just as a matter of course, as the dollars involved certainly justify it.

However, on these smaller projects, the financial pressures are substantial, and adding the extra capital cost and ongoing maintenance and re-certification of IMO metering just cannot be justified from our point of view.

I also suggest that this same rationale can be applied to smaller generators (less than 20 MW) (or smaller load customers) that want to participate in the wholesale market. Why should full IMO compliant metering be required when a single revenue-grade interval meter will suffice, and has sufficed for the LDC’s in the past? Again, do the dollars involved justify the added capital and maintenance costs?

We are in agreement with the proposed rule amendment as written.

I also suggest that only standard Industry Canada approved revenue-grade interval metering be required for those LDC embedded generators and loads that are relatively small (less than 20 MW) who want to participate in the wholesale market.

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 Stakeholding meeting necessary/desirable (please indicate with X):

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

PART 4 – EXTERNAL CONSULTATION MEETING

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