



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: Toronto Hydro-Electric System Limited	
<i>(If applicable) Market Participant / Metering Service Provider No. ¹: 1004</i>	Market Participant Class: Distributor
Telephone: 416.542.2571	Fax: 416.542.2776
Email Address: rzebrowski@torontohydro.com	

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>00258</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: July 15, 2004</p>

PART 3 – COMMENTS ON RULE AMENDMENT

Provide your comments.

Toronto Hydro-Electric System Limited (THESL) appreciates this opportunity to make comments on these proposed Market Rule amendments.

Frequency of IT Checks

The IMO proposes to amend section 1.4 of Appendix 6.3 to reduce the frequency of IT checks

It has been the experience of Toronto Hydro-Electric System Limited (THESL) that Instrument Transformers (ITs) are extremely reliable devices. THESL believes that reducing the test frequency to a 6-year cycle will not put any market participant at risk. Accordingly, THESL supports the reduced testing frequency of ITs.

Main/Alternate Installations

The IMO proposes to amend the Market Rules such that metering installations with a main/alternate arrangement would be subject to an IT check.

THESL has no concerns about a new requirement to perform an IT check for main/alternate metering arrangements provided that the frequency of these checks is on a 6-year cycle as proposed.

The Panel has requested comments regarding the issue of whether or not the requirement for routine IT checks should differentiate between capacitor voltage transformers (CVTs) and conventional electromagnetic voltage transformers (VTs).

Typically, CVTs are thought to be less accurate than the more traditional electromagnetic voltage transformers. THESL recognizes, however, that CVTs are used almost exclusively on the high-voltage (115kV or 230kV) side of transformer stations but is unaware of any location where they are used on the low-voltage side. It is unlikely that THESL would ever need to install or maintain CVTs when it becomes the MSP at the various wholesale delivery points.

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:

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