



## Market Rule Amendment Written Submission

This form is used to provide comment on a *market rule* amendment under consideration by the *IESO*. Please complete all four sections of this form and submit the completed form by email or fax to the following:

Email Address: [Rule.Amendments@ieso.ca](mailto:Rule.Amendments@ieso.ca)  
 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 *IESO* 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 *IESO* 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: Hydro One Networks Inc. \_\_\_\_\_

(if applicable) *Market Participant / Metering Service Provider* No.<sup>1</sup>: 102007 *Market Participant Class:* Transmitter

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E-mail Address: David.Kiguel@HydroOne.com

### PART 2 – MARKET RULE AMENDMENT REFERENCE

**Type of Rule Amendment Being Commented on** (please indicate with x):

Amendment Submission     Proposed Rule Amendment     Recommended Rule Amendment

**MR Number:** MR-00379

This *Market Rule* number is located on the “Current Market Rule Amendment” web page.

**Date Relevant *Amendment Submission*, Proposed or Recommended Rule Amendment Posted for Comment:** April 21, 2011

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

**PART 3 – COMMENTS ON RULE AMENDMENT**

Provide your comments.

Hydro One Networks Inc. fully supports this Rule Amendment needed to correct the existing inconsistency on the applicability of the NERC and NPCC Reliability Standards in Ontario and we appreciate the opportunity to provide the following comments:

Section 1.2.6:

Subsections 1.2.6.1 and 1.2.6.2 refer to timing that standards shall be declared in force while subsection 1.2.6.3 does not. Subsection 1.2.6.3 is a condition to use the timing subsections. For clarity, Section 1.2.6 should be as follows:

1.2.6 Subject to section 1.2.7, *reliability standards* established by a *standards authority* that have not otherwise been stayed or revoked and referred back to the standards authority for further consideration by the Ontario Energy Board shall be declared in force in Ontario:

1.2.6.1 ~~where~~ the *reliability standards* are declared in force in the United States or, for *NPCC* reliability criteria, when declared in force by *NPCC*; and

1.2.6.2 after the expiry of the period for initiating a review before the *Ontario Energy Board* and the conclusion of any such review; ~~and~~

~~1.2.6.3 where the *reliability standards* have not otherwise been stayed or revoked and referred back to the standards authority for further consideration by the Ontario Energy Board;~~

and shall cease to be in force in Ontario when they cease to be in force in the United States.

Definition of standards authority:

As written, the definition means that a *standards authority* is only one of the cited bodies at any given time as it would allow for no more than one of them being a *standards authority*. To reflect the intended meaning, the proposed definition should be changed as follows:

*standards authority* means *NERC*, *NPCC*, any successors thereof, ~~or~~ and any other agency or body that approves standards or criteria applicable both in and outside Ontario relating to the *reliability of transmission systems*;

**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:

As per the TP’s direction, the IESO has already taken steps to consult with the RSSC.

**PART 4 – EXTERNAL CONSULTATION MEETING**