

PART 1 – MARKET RULE INFORMATION

Identification No.: MR-00282-R00						
Subject:	Reliabilit	eliability				
Title:	Revisions to Emergency Preparedness Market Rules					
Nature of Proposal:			Deletion		Addition	
Chapter:	5			Appendix:		
Sections:	ions: 11.4					
Sub-section	s proposed	for amending:	All			

PART 2 – PROPOSAL HISTORY

Version	Reason for Issuing	Version Date
1.0	For Technical Panel Review and Comment	October 13, 2004
2.0	Posted for Stakeholder Review and Comment	October 21, 2004
3.0	Submitted for Technical Panel Vote	November 16, 2004
4.0	Recommended by Technical Panel and submitted to IMO Board for approval	November 17, 2004
Approved Amendment Publication Date:		
Approved Amer	ndment Effective Date:	

Provide a brief description of the following:

- The reason for the proposed amendment and the impact on the IMO-administered markets if the amendment is not made
- Alternative solutions considered
- The proposed amendment, how the amendment addresses the above reason and impact of the proposed amendment on the IMO-administered markets.

In 1998, the IMO was directed by the Ministry of Energy, (MOE) to assist in the preparation of emergency plans describing how market participants will respond to emergencies affecting the supply or delivery of electricity by co-ordinating efforts among market participants. To accomplish this, the stakeholder-represented Emergency Preparedness Task Force (EPTF), chaired by the IMO's Chief Operating Officer, was established in November 1998 to direct and oversee these efforts.

As a result of the August 2003 blackout and system restoration, the EPTF and the Emergency Preparedness Working Group (EPWG), an IMO led working group established under the EPTF, have identified the need for changes to the emergency preparedness market rules.

The following are proposed revisions to Chapter 5, section 11 of the market rules that would bring them in line with the decisions of these two groups:

- Under section 11.4.4 each market participant must have their emergency preparedness plan and restoration plan market participant attachment independently audited every three years by an IMO approved authority. The IMO has determined that a number of audits would be unnecessarily performed since many market participant documentation or responses are currently at a satisfactory level. Under the current market rules all market participants, regardless of whether their documentation or response is at a satisfactory or unsatisfactory level, would be forced to bear the potential considerable costs of these audits. It is proposed that this requirement, for market participants to have their emergency preparedness plan and restoration plan market participant attachment audited every three years, be removed from the market rules. In lieu, however, it is proposed that IMO reserve the right to require an independent audit of a market participant's emergency preparedness plan and/or restoration plan market participant attachment if their documentation or response is not at satisfactory levels. The criteria used to determine satisfactory levels relate to a market participant that repeatedly violates rules, steadfastly refuses to participate in exercises or cannot respond adequately in exercises, or does not submit a plan or annual review. It is also proposed, under section 11.4.4, that market participants bear the cost of such an audit since it is the market participant that is responsible for having complete and accurate emergency plans. Also, the market participant is the party who ultimately gains the benefits of the improvements to their emergency plans that occur as a result of an audit. Last, it is proposed that the independent audit may be conducted by the market participant's internal auditors or a peer review team having diverse membership or industry emergency preparedness expertise. The IMO has determined there are currently few external auditors with the required qualifications to conduct such audits on emergency plans. The intent is that the audit be conducted by people who have an arms length relationship with the market participant that is responsible for the plans.
- Currently there is no requirement in the market rules for a market participant's emergency preparedness plan or restoration plan market participant attachment to be certified or "signed-off" by an officer of the market participant's organization. Therefore, the IMO and the market has inadequate assurance of the validity of a market participant's emergency preparedness plan or restoration plan market participant attachment documents. As well, since it is being proposed to remove the requirement for 3 year audits, the IMO requires some form of legally supported sign-

off on emergency preparedness documents provided to them. It is therefore proposed that all new, reviewed and audited (whether changes are required or not) emergency preparedness plans and restoration plan market participant attachments shall be certified by an officer of the submitting market participant's organization.

- Section 11.4.6 requires the IMO to review its emergency preparedness plan and the Ontario electricity emergency plan at least annually, or as required. The IMO proposes that it also be required to review at least annually, or as required, the Ontario power system restoration plan. The exclusion of the review of the Ontario power system restoration plan in this section appears to have been an oversight. As well, since market participants are obligated to conduct an audit if directed to do so by the IMO under the proposed emergency preparedness market rule amendments, it is prudent to also obligate the IMO to conduct an audit of its emergency preparedness plans if directed by the Minister to do so. Therefore, it is proposed to include an obligation in section 11.4.6 on the IMO to conduct an audit if directed by the Minister. For the same reasons as it is proposed under section 11.4.4 that each market participant bear the cost to audit their emergency preparedness plans, it is also proposed that the IMO bear the costs of its audit under section 11.4.6. Last, it is proposed that the independent audit may be conducted by the IMO's internal auditors or a peer review team having diverse membership or industry emergency preparedness expertise. The IMO has determined there are currently few external auditors with the required qualifications to conduct such audits on emergency plans. The intent is that the audit be conducted by people who have an arms length relationship with the market participant that is responsible for the plans. As well, the costs for such external audits are potentially quite considerable.
- Section 11.4.7 sets out the process for the Ministerial approval of the auditor of the emergency preparedness plan and the Ontario electricity emergency plan. It is proposed to remove this obligation on the Minister since it is inappropriate for the market rules to impose any requirements on the Minister.
- The current definition of "record of review" in chapter 11 states that a "record of review" means the document issued by the IMO to a restoration plan market participant pursuant to section 11.4.1 of chapter 5 that describes the review process. The manner in which this definition is written could lead a reader to assume that it is the "record of review" that describes the review process. This is not the case. It is section 11.4.1 of chapter 5 that describes the review process. In order to ensure that the definition does not mislead a reader, it is proposed to clarify in the definition that it is chapter 5, section 11.4.1 that describes the review process and not the "record of review".
- Expand the scope of the Ontario electricity emergency plan in section 11.2.1 of Chapter 5 to capture emergencies associated with both the integrated power system and registered facilities. Section 11.2.1 of chapter 5 states that the IMO shall develop and maintain an Ontario electricity emergency plan for the IMO and market participants for the purpose of alleviating the effects of an emergency on the integrated power system. The term "integrated power system" is defined as the IMO-controlled grid and the structures, equipment and other things that connect the IMO-controlled grid with transmission systems and distribution systems in Ontario and transmission systems outside Ontario, whereas the term "electricity system" is defined as the integrated power system and registered facilities connected to the grid. In respect of emergency preparedness and system restoration, use of the term "electricity system" would extend the scope of the emergency preparedness program to capture certain emergencies that "integrated power system" would not. For example, in the case of the 1998 ice storm, the problems were more largely associated with those facilities connected to the grid. There were few problems with the grid itself.
- Replace the term "restoration plan market participant" and "restoration plan market participant

attachment" and replace them with "restoration participant" and "restoration participant attachment" respectively. The existing terms are unnecessarily lengthy and wordy. The current terms are causing problems with the heading size in the IMO's templates due to their length.

Replace the term "sensitive users" with the term "priority loads" to be consistent with the terminology used by the provincial government during Blackout-2003 to describe hospitals, water supply facilities, water treatment facilities and fuel supply facilities. As well, the term sensitive users is too vague and subjective, and may be interpreted to mean sensitivity to quality of power supplied rather than supply itself.

PART 4 – PROPOSED AMENDMENT

11.4 **Review and Audit**

- 11.4.1 The IMO shall review each emergency preparedness plan and each restoration plan market participant attachment submitted to it and shall prepare and provide to the relevant market participant or restoration plan market participant a record of review indicating the changes, if any, required to be made and the date by which the revised emergency preparedness plan or restoration plan market participant attachment must be submitted with the IMO.
- 11.4.2 Each market participant shall make such changes to its emergency preparedness plan or restoration plan market participant attachment as may be required by the record of review and shall submit to the IMO a revised emergency preparedness plan or restoration plan market participant attachment within the time specified in the record of review or within such other period as may be agreed with the IMO.
- 11.4.3 Each market participant shall review its emergency preparedness plan and restoration plan market participant attachment at least annually, or as required, and shall, following such review, submit to the IMO:
 - a statement certified by an officer or equivalent of the market 11.4.3.1 *participant* confirmingation that the review has not required any change to be made to its emergency preparedness plan or its restoration plan market participant attachment; or
 - 11.4.3.2 a revised version of its *emergency preparedness plan* or *restoration* plan market participant attachment, amended as may be required by the results of the review, together with a statement certified by an officer or equivalent of the market participant identifying such amendments, as the case may be. Each market participant shall ensure

that any revised *emergency preparedness plan* or *restoration plan market*-participant attachment prepared and submitted pursuant to this section 11.4.3 complies with section 11.2.4 or 11.3.6, respectively.

- Each market participant shall ensure that its emergency preparedness plan and restoration plan market participant attachment are independently audited every three years by an IMO-approved authority When directed by the IMO, the market participant shall have an independent audit of its emergency preparedness plan and/or restoration participant attachment conducted. The independent audit may be conducted by, without limitation, the market participant's internal auditors or before a peer review team having diverse membership or industry emergency preparedness expertise. The cost of conducting such an audit shall be borne by the market participant. Each market participant and shall, following such audit, submit to the IMO a copy of the audit report, together with:
 - 11.4.4.1 <u>a statement certified by an officer or equivalent of the market</u>

 <u>participant</u> confirmingation that the audit has not required any change to be made to its <u>emergency preparedness plan</u> or its <u>restoration plan</u>

 <u>market participant attachment;</u> or
 - 11.4.4.2 a revised version of its *emergency preparedness plan* or *restoration plan market participant* attachment, amended as may be required by the results of the audit, together with a statement certified by- an officer or equivalent of the *market participant* identifying such amendments, as the case may be. Each *market participant* shall ensure that any revised *emergency preparedness plan* or *restoration plan market participant attachment* prepared and submitted pursuant to this section 11.4.4 complies with section 11.2.4 or 11.3.6, respectively.
- 11.4.5 For the purposes of section 11.4.4, the *IMO* may approve one or more authorities as the *IMO* determines is or are capable of conducting the independent audit including, without limitation, a peer review team having diverse membership or industry *emergency* preparedness experts. [Intentionally left blank section deleted]
- The *IMO* shall review its *emergency preparedness plan*, and the *Ontario electricity emergency plan* and the *Ontario power system restoration plan* at least annually, or as required. When directed by the *Minister*, the *IMO* shall have an independent audit conducted of these plans. The independent audit may be conducted by, without limitation, the *IMO*'s internal auditors or before a peer review team having diverse membership or industry *emergency preparedness* expertise. The cost of such an audit shall be borne by the *IMO*. The *IMO* shall ensure that its *emergency preparedness plan*, the *Ontario electricity emergency plan*, and the *Ontario power system restoration plan* are independently audited by an auditor approved by the Minister pursuant to section 11.4.7.
- 11.4.7 For the purposes of section 11.4.6, the *IMO* shall provide the *Minister* with the name of an auditor for the *IMO*'s emergency preparedness plan and the *Ontario* power system restoration plan. If the *Minister* does not approve the proposed

auditor, the IMO shall provide such further name or names until such time as the Minister approves an auditor. [Intentionally left blank – section deleted]

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PART 1 – MARKET RULE INFORMATION

Identification No.: MR-00282-R01						
Subject:	Reliabilit	Reliability				
Title:	Revisions to Emergency Preparedness Market Rules					
Nature of Proposal: Alteration Deletion Add		Addition				
Chapter:	5		Appendix:			
Sections:	11.1, 11.2 and 11.3					
Sub-section	s proposed	for amending:	11.111.2	.1, 11.2.4.7(new	v), 11.3.3.3	, 11.3.5 – 11.3.10

Version	Reason for Issuing	Version Date
Approved Amer	ndment Publication Date:	
Approved Amer	ndment Effective Date:	

Provide a brief description of the following:

- The reason for the proposed amendment and the impact on the *IMO-administered markets* if the amendment is not made
- Alternative solutions considered
- The proposed amendment, how the amendment addresses the above reason and impact of the proposed amendment on the *IMO-administered markets*.

Refer to R00	

PART 4 – PROPOSED AMENDMENT

11.1 Objective

11.1.1 The objective of this section 11 is to establish the means by which the *IMO* and market participants will fulfil their respective emergency preparedness and system restoration obligations, including regular and real-time testing; the preparation by the *IMO* of the Ontario electricity emergency plan and the Ontario power system restoration plan; the preparation by market participants of emergency preparedness plans that support and are coordinated with the Ontario electricity emergency plan; and the preparation of restoration plan market participant attachments that support and are coordinated with the Ontario power system restoration plan. This objective will be met through co-operation and in consultation with all relevant market participants.

11.2 Emergency Preparedness Plans and Ontario Electricity Emergency Plan

11.2.1 The *IMO* shall develop and maintain, in consultation with all relevant *market* participants, the *Ontario electricity emergency plan* describing the responsibilities of, and coordinating the actions of, *market participants* and the *IMO* for the purpose of alleviating the effects of an *emergency* on the *integrated* power electricity system, having regard to the mitigation of the impact of an *emergency* on public health and safety as identified in each *market participant's* emergency preparedness plan.

11.2.4 Each *market participant* shall ensure that its *emergency preparedness plan*:

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- describes such planning, testing, information, communication and other elements designated by the *IMO*;
- 11.2.4.2 complies with such *emergency* planning criteria as may be designated by the *IMO*;
- 11.2.4.3 complies with all relevant *reliability standards*;
- is consistent with the *emergency* planning and preparedness procedures established by relevant government authorities;
- indicates the manner in which the impact of an *emergency* on public health and safety will be mitigated; and
- 11.2.4.6 indicates the manner in which the *market participant* will minimize the cutting and expedite the restoration of critical loads and sensitive userspriority loads during short and prolonged *emergencies*; and
- is submitted with a statement certified by an officer or equivalent of the *market participant* stating that the *emergency preparedness plan* is a true and complete copy as at the date of the certification.

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11.3 Ontario Power System Restoration Plan and Restoration Plan Market Participant Attachments

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- 11.3.3 The *Ontario power system restoration plan* shall include, but not be limited to:
 - plans for managing major disturbances on the *IMO-controlled grid* that blackout all or a portion of the *IMO-controlled grid*;
 - plans for the testing and verification of *emergency* preparedness facilities and procedures; and
 - descriptions of the roles of the *IMO* and various <u>restoration</u> <u>market</u> participants in the *Ontario power system restoration plan*.
- 11.3.4 The *IMO* shall file with the *Minister* the *Ontario power system restoration plan* and such other restoration documentation as the *Minister* may require under subsection 39(1) of the *Electricity Act*, *1998*.
- 11.3.5 Each restoration plan market participant shall prepare and submit to the IMO a restoration plan market participant attachment to the Ontario power system restoration plan and such other system restoration-related information as the IMO considers necessary. Each restoration plan market participant shall ensure that its restoration plan market participant attachment complies with section 11.3.6 and

is submitted to the *IMO* not later than the *market commencement date*, or at such later times as the *IMO* shall specify.

- 11.3.6 Each restoration plan market participant shall ensure that its restoration plan market participant attachment:
 - 11.3.6.1 includes the elements described in section 11.3.7;
 - 11.3.6.2 complies with such restoration planning criteria as may be designated by the *IMO*; and
 - 11.3.6.3 complies with all relevant *reliability standards*.
- 11.3.7 Each restoration plan market participant shall ensure that its restoration plan market participant attachment includes:
 - a three year schedule of system restoration training activities, to be conducted by the *restoration plan market-participant*, to be conducted at its own expense. The schedule shall be updated annually;
 - 11.3.7.2 documentation detailing organizational responsibility for co-ordinating with the *IMO* the development of and participation in system restoration drills. Such development and participation shall be conducted by the *restoration plan market* participant at its own expense;
 - 11.3.7.3 a schedule for testing the *restoration* plan market participant's equipment as may be designated in the Ontario power system restoration plan. Such testing shall be conducted by the restoration plan market participant at its own expense;
 - 11.3.7.4 a statement of policy and supporting documentation demonstrating how the *restoration-plan market* participant will minimize the cutting and expedite the restoration of critical loads and sensitive userspriority loads under system restoration conditions; and
 - 11.3.7.5 any other documentation that the *IMO* deems necessary to support or facilitate the successful implementation of the *Ontario power system restoration plan*; and
 - 11.3.7.6 a statement certified by an officer or equivalent of the *market*participant stating that the restoration participant attachment is a true
 and complete copy as at the date of the certification.
- 11.3.9 The *IMO* shall assist *restoration plan market participants* in the development of *restoration plan market participant attachments* that support and are coordinated

- with the *Ontario power system restoration plan* for the purpose of ultimately establishing one integrated restoration plan for Ontario.
- 11.3.10 Each *restoration plan market participant* shall ensure that the guidelines and procedures applicable to it and set forth in the *Ontario power system restoration plan* are carried out by trained operating staff with sufficient authority to take any action that may be necessary to ensure that all relevant equipment is operated in a timely, stable and reliable manner.
- 11.3.11 The *IMO* shall direct *market participants* in restoring the *IMO-controlled grid* following major disturbances. Each such *market participant* shall be responsible for carrying out these *IMO* directions, in accordance with the provisions of the *Ontario power system restoration plan*.

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PART 1 – MARKET RULE INFORMATION

Identification No.: MR-00282-R02					
Subject:	Reliabilit	Reliability			
Title:	Revisions	Revisions to Emergency Preparedness Market Rules			
Nature of Pr	roposal:		☐ Deletion	Addition	
Chapter:	11		Appendix:		
Sections:					
Sub-section	s proposed	for amending:			

Version	Reason for Issuing	Version Date
Approved Ame	ndment Publication Date:	
Approved Ame	ndment Effective Date:	

Provide a brief description of the following:

- The reason for the proposed amendment and the impact on the *IMO-administered markets* if the amendment is not made
- Alternative solutions considered
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PART 4 – PROPOSED AMENDMENT

record of review means the document issued by the *IMO* to a restoration plan market participant pursuant to section 11.4.1 of Chapter 5-that describes the review process;

restoration plan market participant means a market participant whose equipment or facilities are directly connected to the *IMO-controlled grid* and that has physical control, by direct or remote means, of a restoration-related breaker;

restoration plan market participant attachment means the attachment to the Ontario power system restoration plan required to be prepared by a restoration plan market participant and submitted to the IMO in accordance with section 11.3.5 of Chapter 5;

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PART 1 – MARKET RULE INFORMATION

Identification No.: MR-00282-R03							
Subject:	Reliabilit	ability					
Title:	Revisions	Revisions to Emergency Preparedness Market Rules					
Nature of Proposal:			Deletion		Addition		
Chapter:	5			Appendix:			
Sections:	4.7						
Sub-section	s proposed	for amending:	4.7.3				

Version	Reason for Issuing	Version Date
Approved Amer		
Approved Amer	ndment Effective Date:	

Provide a brief description of the following:

- The reason for the proposed amendment and the impact on the *IMO-administered markets* if the amendment is not made
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PART 4 – PROPOSED AMENDMENT

4.7 Black Start Service

- 4.7.1 [Intentionally left blank]
- 4.7.2 The *IMO* shall determine the required amounts and locations of *black start* capability across the *IMO-controlled grid*, as required to satisfy the requirements of the *Ontario power system restoration plan* and all applicable *reliability* standards. The *IMO* shall notify market participants of these requirements before entering into agreements for the provision of *certified black start facilities*.
- 4.7.3 Ancillary service providers providing certified black start facilities must also be *restoration* plan market *participants*.

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PART 1 – MARKET RULE INFORMATION

Identificatio	n No.: MR-00282-R04						
Subject:	Reliability						
Title:	Revisions to Emergency Preparedness Market Rules						
Nature of Pr	oposal:			Deletion		Addition	
Chapter:	1			Appendix:			
Sections:	4.4 and 13.3						
Sub-sections proposed for amending:			4.4.9 and	13.3.14.6			

Version	Reason for Issuing	Version Date
Approved Amer		
Approved Amer	ndment Effective Date:	

Provide a brief description of the following:

- The reason for the proposed amendment and the impact on the *IMO-administered markets* if the amendment is not made
- Alternative solutions considered
- The proposed amendment, how the amendment addresses the above reason and impact of the proposed amendment on the *IMO-administered markets*.

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PART 4 – PROPOSED AMENDMENT

4.4.9 Notwithstanding the coming into force of section 11 of Chapter 5 on the date referred to in Appendix 1.1, it is understood that section 11 of Chapter 5 is being brought into force to support the preparation and, where applicable, the filing of the *Ontario electricity emergency plan*, the *Ontario power system restoration plan*, and the *emergency preparedness plans* and *restoration plan market participant attachments* referred to and in accordance with that section, and no person shall be required to comply with any provision of section 11 of Chapter 5 that is not reasonably required for such purpose if such compliance would be inconsistent with the manner in which that person lawfully and in accordance with any applicable contractual obligations operates its *facilities* on such date.

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- Nothing in this section 13.3 shall excuse the *IMO* or a *market participant* from performing any of their respective obligations contained in:
 - 13.3.14.1 those provisions of these *market rules* that govern the *IMO* and the *market participant* during an *emergency* or while the *IMO-controlled grid* is in a *high-risk operating state* or in an *emergency operating state*;
 - 13.3.14.2 those provisions of any policy, guideline or other document referred to in section 7.7 or any *market manual* that govern the *IMO* and the *market participant* during an *emergency* or while the *IMO-controlled grid* is in a *high-risk operating state* or in an *emergency operating state*;
 - 13.3.14.3 the Ontario electricity emergency plan;
 - 13.3.14.4 the market participant's emergency preparedness plan;

- 13.3.14.5 the Ontario power system restoration plan; or
- 13.3.14.6 the market participant's restoration plan market participant attachment,

PART 5 – IMO BOARD COMMENTS

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PART 1 – MARKET RULE INFORMATION

Identificatio	ion No.: MR-00282-R05						
Subject:	Reliabilit	Reliability					
Title:	Revisions to Emergency Preparedness Market Rules						
Nature of Pr	fature of Proposal: Alteration			Deletion		Addition	
Chapter:	5			Appendix:			
Sections:	11.6 to 11.8						
Sub-sections proposed for amending:			Various				

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Provide a brief description of the following:

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Refer to R00			

PART 4 – PROPOSED AMENDMENT

11.6 Emergency Facilities

11.6.2 The *IMO-administered markets* shall continue to operate during an evacuation of the *IMO*'-s principal control centre unless conditions exist that would warrant a suspension of market operations as described in Chapter 7.

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11.7 Testing

- 11.7.1 Each *market participant* shall ensure that the capability and reliability of its personnel, procedures, and equipment are maintained to the extent necessary to fulfill its obligations under its *emergency preparedness plan* and its *restoration plan market* participant attachment.
- 11.7.2 The *IMO* shall develop, schedule, implement and conduct such tests as are provided for in the *Ontario electricity emergency plan* and the *Ontario power system restoration plan*.
- 11.7.3 [Intentionally left blank]
- 11.7.4 Each *market participant* shall support and actively participate, at its own expense and as directed by the *IMO*, in the implementation and testing of its *emergency* preparedness plan, its restoration plan market participant attachment, the Ontario electricity emergency plan, the Ontario power system restoration plan and voice communications facilities.

11.7.5 The *IMO* shall schedule the tests referred to in section 11.7.4 at an appropriate time of the year and time of day, in consideration of the needs of *market participants* and of the desire to minimize their costs relating to such tests. To the extent practicable, such tests of the *restoration plan market participant attachment* shall be scheduled in a manner consistent with the *outage* coordination process described in section 6.

11.8 Enforcement

11.8.1 Failure by a *market participant* to take any action required to be taken in, or to act in a manner consistent with, its *emergency preparedness plan* or its *restoration plan market participant attachment* shall be deemed to constitute a breach of the *market rules*.

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