



Market Rule Amendment Submission

This form is used to request an amendment to, or clarification of, the *Market Rules*. Please complete the first four parts of this form and submit the completed form by email or fax to the following:

Email Address: Rule.Amendments@ieso.ca

Fax No.: (416) 506-2847 Attention: Market Rules Group

Subject: Market Rule Amendment 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* will *publish this amendment submission* if the *Technical Panel* determines it warrants consideration and may invite public comment.

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 contact information in full.

Name: IESO Staff

(if applicable) *Market Participant /*

Market Participant Class:

*Metering Service Provider No.*¹: N/A

N/A

Telephone: 905-403-6983

Fax: 905-855-6371

E-mail Address: rule.amendments@ieso.ca

PART 2 – MARKET RULE AMENDMENT SUBMISSION INFORMATION

Subject: Reliability Standards

Title: Identification of Reliability Standards

Nature of Request (please indicate with x)

Alteration

Deletion

Addition

Clarification

Chapter: 5

Appendix: N/A

Sections: 3.2

Sub-sections proposed for amending/clarifying: 3.2.5, 3.2.6

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

PART 3 – DESCRIPTION OF THE ISSUE

Provide a brief description of the issue and reason for the proposed amendment. If possible, provide a qualitative and quantitative assessment of the impacts of the issue on you and the *IESO-administered markets*. Include the Chapter and Section number of the relevant *market rules*.

Summary

It is proposed to modify the market rules to align the Identification of Reliability Standards with the process established by the IESO which provides market participants the ability to retrieve applicable reliability standards on a continual basis.

Background

Under sections 3.2.5 and 3.2.6 of Chapter 5, the IESO must consult and advise each market participant of their reliability standards' obligations or requirements that the IESO determines apply to that market participant.

In 2012, the IESO updated its current process for identifying reliability standards applicable to market participants. The process uses an IESO maintained spreadsheet based mapping tool of all the applicable reliability standards for each market participant class. This provides market participants with the ability to retrieve the reliability standards and criteria requirements that are applicable to them. This process uses an approach similar to NERC's Statement of Compliance Registry Criteria¹.

The current market rules for the Identification of Reliability Standards do not reflect this process developed by the IESO. Market rule amendments are necessary to align the market rules with the process introduced by the IESO in 2012.

Discussion

The IESO has developed a process for the Identification of Reliability Standards that allows the IESO to better leverage its limited Reliability Compliance and Support resources. To facilitate this process the IESO has:

- Developed the “Applicability Criteria for Compliance with NERC Reliability Standards and NPCC Criteria;”
- Updated the mapping between Ontario market participant class definitions and the NERC Functional Model Entities;
- Created a spread-sheet based mapping tool to assist market participants in obtaining a list of the standard requirements that apply to them based on the facilities they own or operate, the functions they perform, and other key attributes; and
- Produced the Bulk Electric System list to identify those market participants and associated facilities that are subject to compliance with NERC reliability standards and NPCC criteria.

Access to the above material can be found on the IESO website, [Ontario Reliability Compliance Program](#).

The process was introduced to the Reliability Standards Standing Committee (RSSC) by the IESO in

¹ [NERC's Statement of Compliance Registry Criteria](#)

PART 3 – DESCRIPTION OF THE ISSUE

March 2012 and has the following benefits:

- Provides clarity regarding the standard and criteria requirements that are applicable to each market participant based on the facilities they own or operate, the functions they perform and other attributes that have a material impact on the bulk power system;
- Allows active and pending market participants to always have an up-to-date list of the standard requirements that are or will be applicable to their elements or facilities;
- Brings the IESO process for the Identification of Reliability Standards in line with best practices in other jurisdictions; and
- Increases the efficiency and effectiveness of administering the IESO's obligations to advise market participants of the applicable reliability standards and obligations under sections 3.2.5, 3.2.6 and 3.2.7 of chapter 5 of the market rules.

Market rule amendments will obligate the IESO to maintain the spreadsheet based mapping tool and provide market participants that are subject to compliance the ability to retrieve the applicable NERC Reliability Standards and NPCC Criteria based on the applicability criteria for compliance². Market participants are obligated to ensure their facilities are compliant with all applicable reliability standards (as per Chapter 4 section 2.1.1³) and participants can now utilize the newly developed reliability mapping tool for a continual up-to-date listing of the standards and criteria that apply to them. In turn the amendment will also remove the obligation for the IESO to consult with each market participant which is a process that is considered too onerous for the Reliability Compliance and Support group and is not consistent with best practices in other jurisdictions.

PART 4 – PROPOSAL (BY SUBMITTER)

Provide your proposed amendment. If possible, provide suggested wording of proposed amendment.

It is proposed to modify the market rules to align the Identification of Reliability Standards with the process established by the IESO which provides market participants the ability to retrieve applicable reliability standards on a continual basis.

PART 5 – FOR IESO USE ONLY

Technical Panel Decision on Rule Amendment Submission: _____

MR Number: _____

Date Submitted to *Technical Panel*: _____

² [Applicability Criteria for Compliance with NERC Standards and NPCC Criteria](#)

³ Chapter 4 section 2.1.1 – “All market participants shall ensure that their equipment and facilities connected to the IESO-controlled grid adhere to all applicable reliability standards.”

PART 5 – FOR IESO USE ONLYAccepted by *Technical Panel* as: (please indicate with x)

Date:

 General Urgent MinorAugust 21, 2012

Criteria for Acceptance: The amendment submission will align the Identification of Reliability Standards with the process established by the IESO which provides market participants the ability to retrieve applicable reliability standards on a continual basis.

Priority: Regular

Criteria for Assigning Priority: The Reliability Standards Standing Committee was introduced to the process for identifying reliability standards in March 2012 and will be invited to take part in a stakeholder commenting period.

Not Accepted (please indicate with x): Clarification/Interpretation Required (please indicate with x): *Technical Panel* Minutes Reference: IESOTP 264-1

Technical Panel Comments: The Technical Panel requested that the rules language should not completely remove the consultation process with market participants as it can be useful for scenarios of increased complexity with respect to shared reliability standards. The Technical Panel also requested that the spread-sheet based mapping tool be presented to Panel members to gauge the operational and accuracy implications of market participants utilizing the tool.