



Exemption Application

FOR IMO USE ONLY

Exemption ID #: _____

Submit this form by e-mail to: exemptions@theimo.com

Subject: *Exemption Application*

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 information submitted will be assigned the appropriate confidentiality level upon receipt.

PART 1 – EXEMPTION APPLICANT - GENERAL INFORMATION

Organization Name: Great Lakes Power Limited Distribution Division

Market Participant/Metering Service Provider No. (if applicable): _____ IMO Help Centre (IHC) Ticket No. (if applicable): _____

Address: 2 Sackville Road

City/Town: Sault Ste Marie Province/State: ON

Postal/Zip Code: P6B 6J6 Country: Canada

Fax No.: 705-941-5600

Email Address: rreid@glp.on.ca

Main Contact

Name: Janis Gartshore

Telephone No.: 705-941-5657 Fax No.: 705-759-2218

E-mail Address: jcgartshore@glp.on.ca

Web Site (URL): www.glp.on.ca

Alternative Contact

Name: Rob Reid

Telephone No.: 705-941-5647 Fax No.: 705-941-5600

E-mail Address: rreid@glp.on.ca

PART 2 – INFORMATION ABOUT THE EXEMPTION APPLICATION

1. Is this exemption application being submitted for existing facilities or equipment prior to market commencement date pursuant to Section 1.5.1 of the *Exemption Application and Assessment Procedure*?

☒ Yes

☐ No

2. Please specify the duration for which you would like the exemption granted in days, months or years:

Lifetime of Installation

Please cite the Market Rules section number(s) to which this Exemption Application relates:

Please cite policy, standard or procedure to which this Exemption Application relates (including section number(s)):

Wholesale Revenue Metering Standard

Section 7.4.1 (k)

PART 3 – SUBMISSIONS IN SUPPORT OF EXEMPTION APPLICATION

Attach an exemption applicant's plan detailing:

- The manner and time within which the exemption applicant will become compliant;
- The manner in which the exemption applicant proposes to modify its equipment or facilities or otherwise conduct its operations during the period of time for which the exemption would be in effect; and
- The exemption applicant's estimate of any costs that may be imposed on the IMO or on other Market Participants, if the exemption were granted.

The following submissions must be included, either below or as attachments:

(a) For exemption applications submitted prior to market opening for facilities/equipment in operation before or on April 17, 2000 and relating to the technical requirements of Market Rules contained in Appendix 2.2 (other than those for participant workstations or dispatch workstations), Chapter 4 (other than Sections 6.1.5 to 6.1.21), or the technical requirements set forth in Section 12 of Chapter 5:

- The exemption applicant's assessment as to whether or not the exemption, if granted would materially:
 - ♦ impact the ability of the IMO to direct the operations and maintain the reliability of the IMO-controlled grid;
 - ♦ affect the ability of the IMO to operate the IMO-administered markets in an efficient, competitive and reliable manner.
- The exemption applicant's assessment of whether the cost or delay to the exemption applicant of complying with the obligation or standard to which the exemption application relates is reasonable, having regard to the nature of the obligation or standard, the nature of the exemption application and the anticipated impact of non-compliance by the exemption applicant in terms of the elements referred to above.

(b) Additionally, for all other exemption applications:

- The exemption applicant's assessment as to whether or not the exemption, if granted would materially:
 - ♦ impact the ability of the IMO to ensure non-discriminatory access to the IMO-controlled grid;
 - ♦ increase costs of market participants; or
 - ♦ increase costs of the IMO;
- An assessment of whether the exemption would, if granted, give the exemption applicant an undue preference in the IMO-administered markets;
- Where the exemption applicant is the IMO, identification of the benefit to Market Participants of compliance with the obligation or standard to which the exemption application relates relative to the financial and other resources required to achieve compliance within such deadlines as may be applicable;
- Where the exemption applicant is the IMO, the manner in which it proposes to operate the IMO-administered markets or direct the operations and maintain the reliability of the IMO-controlled grid during the period in which the exemption would be in effect;

PART 3 – SUBMISSIONS IN SUPPORT OF EXEMPTION APPLICATION

- Identification as to whether the facility or equipment that is the subject-matter of the exemption application:
 - ◆ was in service or was returned to service on the date on which the obligation or standard to which the exemption application relates came into force;
 - ◆ was ordered by the exemption applicant on or prior to the date on which the obligation or standard to which the exemption application relates came into force; or
 - ◆ was in the process of construction on or prior to the date on which the obligation or standard to which the exemption application relates came into force, and;
- An assessment of the capability of the owner of the facility to operate the facility consistent with the terms of the proposed exemption.

Granting of this exemption will not threaten the ability of the IMO to direct the operations and maintain the reliability of the grid, threaten the ability of the IMO to ensure non-discriminatory access to the grid, affect the ability of the IMO to operate the IMO-administered markets in an efficient, competitive and reliable manner, or give the exemption applicant an undue preference within the IMO markets. The applicant believes that there would be no increased costs to the IMO or other market participants with the granting of this exemption.

This facility in service on the date that this obligation or standard to which this application relates came into force.

The applicant is requesting an exemption from section 7.4.1 (k) of the Wholesale Revenue Metering Standard that states that the "cabling from the instrument transformers to the meter enclosure shall be routed in dedicated conduit, and the route shall be visually traceable". The cabling from the instrument transformers to the meter enclosure is in dedicated conduit, but the route is not visually traceable due to the embedded conduit. The applicant feels that the embedded conduit does not impose any errors or affect the metering accuracy or integrity of the installation. The granting of this exemption would have no adverse affect on the IMO-administered market or other market participants. The installation of embedded conduit is a common practice used at many electrical facilities.

The costs associated with complying to this requirement may be considered minimal, however, the removal of the embedded conduit would result in unnecessary exposure of the secondary circuits to the elements. The applicant feels that the use of the embedded conduit is both practicable and reasonable in these installations.

The meter points ID's for which the applicant is requesting the exemptions are:

Harris GS ID#106157

Hogg GS ID# 106157

Steephill GS ID# 106168

Andrews G3 ID# 106152

Andrews G1 ID# 106150

Andrews G2 ID# 106151

Mission GS ID# 106165

Goulais DS ID# 106177

PART 3 – SUBMISSIONS IN SUPPORT OF EXEMPTION APPLICATION

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PART 4 – SUPPORTING DOCUMENTATION TO BE ATTACHED BY EXEMPTION APPLICANT

Please list below all supporting documents attached to this exemption application.

1. Exemption Applicant's Plan (must be attached)
- 2.
- 3.
- 4.
- 5.

PART 5 – CERTIFICATION

The exemption applicant hereby declares that the information contained in and submitted in support of this document is, to the best of the exemption applicant's knowledge, complete and accurate.

Janis Gartshore

Name

Technical Support

Title

PART 6 – CONFIDENTIALITY

- ☒ The exemption applicant agrees that information on this application may be posted in its entirety on the IMO Web site in accordance with the provisions of the *Exemption Application and Assessment Procedure*

OR

- ☐ The exemption applicant claims confidentiality over parts of the Exemption Application in accordance with Section 1.6.3 of the *Exemption Application and Assessment Procedure*. Parts of this Exemption Application over which confidentiality is claimed are highlighted. The balance of the information on this exemption application may be posted on the IMO Web site.

Janis Gartshore _____

Name

Technical Support _____

Title