

January 23, 2008 Revision: Schedule updated in Section V.

I. Introduction

One of the joint US - Canada recommendations following the August, 2003 blackout investigation was that all transmission users, owners and operators be subject to mandatory, enforceable reliability standards.

Compliance with reliability standards is already mandatory in Ontario, through the market rules and is monitored through the IESO Reliability Compliance Program (IRCP). The IESO's Market Assessment and Compliance Division (MACD) is accountable for the compliance and the enforcement process.

Before the Electric Reliability Organization (ERO) was created in 2006, most jurisdictions outside of Ontario observed reliability standards on a voluntary basis only. Under the ERO, jurisdictions outside of Ontario will also have to comply with reliability standards – compliance will no longer be voluntary.

On June 28, 2007, the IESO Board approved a market rule amendment that obligates the IESO to identify, in consultation with market participants, each market participant's reliability standard's obligations and reporting requirements. This identification will provide clarity and certainty to market participants as to which reliability standards' obligations or requirements apply to them. In addition, the amendment provides a clear recourse for market participants to address any disagreement in assigned obligations. This amendment can be found at: [Board Approval of MR-00330](#)

One of the tasks required as a result of this amendment is for the IESO to align or map market participants to the North American Electric Reliability Corporation (NERC) entity definitions (see Appendix A for the mapping matrix).

A market participant can have a single or multiple entity designations depending on their facilities and activities.

Once this is completed, the threshold of applicability for the various NERC requirements and NPCC criteria will be established that will specify what each market participants is accountable for and what reporting forms are required. The IESO will produce this mapping of requirements and criteria on the basis of market participants' classifications, their specific facilities and based on a set of defined criteria, the associated Ontario market rules and existing established processes. A draft of the design criteria can be found on the [Reliability Standards Standing Committee page](#)¹.

¹ Go to the Reliability Standards Standing Committee page (http://www.ieso.ca/imoweb/consult/consult_rssc.asp), under material for the June 20, 2007 meeting, open Meeting Materials (.zip) file and open the file called: "6c01_IRCP Reliability Standards & Criteria Mapping Project R4_RSSC.pdf"

For more information on the role of the new Electric Reliability Organization (ERO), and the impact on Ontario please see [Quick Take 22](#)

II. Stakeholders

All authorized [market participants](#) are required to comply with the market rules, including applicable NERC reliability standards and NPCC criteria. Accordingly, this mapping exercise therefore impacts all applicable market participants.

III. Stakeholder Engagement Goals and Objectives

Goal

The goal of this plan is to work individually with market participants to establish the appropriate NERC functional model entity designations that apply to them, and associated standards obligations for each of their facilities.

Objectives

1. To provide individual market participants with a determination of the mapping of their respective reliability obligations or requirements as they apply in accordance with the NERC functional model.
2. To allow the opportunity to provide feedback to the mapping and on any impact this change may have on their business.
3. To solicit feedback on new forms required to be completed by market participants.
4. To minimize any adverse effects on market participant operations and processes.

IV. Stakeholder Engagement Approach and Methods

The implementation of this stakeholder engagement plan will be in accordance with the IESO's approved [stakeholder engagement principles](#). The stakeholder plan will be subject to review and update as the process evolves and stakeholder comments are incorporated, and as revisions are warranted.

The stakeholder engagement approach will be feedback — with request for stakeholder review and written feedback.

The stakeholder engagement method to be employed will be a [web-based posting](#) with a request for written comments via e-mail. An e-mail communication will be sent on the posting of this stakeholder plan and the opportunity for feedback on this stakeholder plan and schedule. Web-based postings provide all interested stakeholders with an efficient low-cost method to be informed of the proposed changes with the opportunity to communicate their views via e-mail to the IESO (stakeholder.engagement@ieso.ca). All stakeholder input, including dissenting views, will be posted on the IESO website.

Following this, individual emails will be sent to participants regarding the mapping asking for feedback.²

Communication of the mapping will be an open and iterative process of dialogue between the IESO and the participant. The IESO, in collaboration with market participants, will determine the NERC entity classification to that of the Ontario market participants. Feedback from this will be participant specific and will not be posted for confidentiality reasons.

When new forms are being proposed they will be posted and there will be a communication sent out to all impacted market participants with an opportunity for feedback

In addition, feedback from [working group members](#) in the [Reliability Standards Standing Committee](#) will be used for additional input as well as for specific feedback on the new form requirements.

All feedback from stakeholders will be considered prior to implementation of the final schedule. This stakeholder plan provides all stakeholders with the opportunity to communicate their views and positions directly to the IESO in advance of any implementation.

Feedback will be provided on all stakeholder comments and how this input was considered, and the results of the consultation will be posted on the IESO website. All public manuals and technical documents would be updated to reflect any changes. Changes to these documents will follow the usual change control practices.

Updating on the implementation phase will be done via the [Reliability Standards Standing Committee](#) .

² This e mail will be sent to the Reliability Compliance contact within the Registration data base. If a Reliability Compliance contact does not exist, then the communication will be sent to the Main contact in the Registration database. Participants can validate this contact by referring to their participant registration data, by contacting their account representative or by sending an e mail to rsp@ieso.ca. The IESO will request confirmation by the participant back to the IESO on receipt so the IESO is aware that it has been received.

V. Decision Making Steps and Schedule of Activities

Stakeholder Engagement Schedule	
Activity	Target Date
1. Discussion on proposed roll out to the members of the Reliability Standards Standing Committee.	Completed June 20, 2007
2. Posting of draft stakeholder plan and e mail communication to market participants.	June 21, 2007
3. Deadline for comments on the plan.	June 28, 2007
4. Post final stakeholder plan and IESO response to comments on the plan.	Late June 2007
5. Begin implementation phase. Individuals e-mails sent to participants based on proposed NERC entity type.	Beginning June 27, 2007
6. Deadline for feedback from participants on the proposed NERC entity(s) that apply to them.	June to August
7. Posting of proposed new forms and email communication to stakeholders, as well as discussion of the new forms with the Reliability Standards Standing Committee.	Mid August
8. Deadline for feedback on proposed new forms.	Late August
9. Update Reliability Standards Standing Committee on status of implementation.	September 19, 2007
10. Final mapping of Reliability Obligations: Reliability Standards Standing Committee meeting .	January 28, 2008
11. Completion of implementation phase.	January 2008

Process Evaluation

Stakeholders will be provided the opportunity to provide feedback on the effectiveness of the process in achieving stated objectives.

Appendix A – Finalized matrix showing Ontario market participants mapped to NERC entities

Market Rules & Licence	Functional Model (NERC Standards)
<ul style="list-style-type: none"> • Generator 	<ul style="list-style-type: none"> • Generator Owner • Generator Operator • Transmission Owner • Resource Planner • Purchase-Selling Entity
<ul style="list-style-type: none"> • Transmitter 	<ul style="list-style-type: none"> • Transmission Owner • Transmission Planner
<ul style="list-style-type: none"> • Distributor 	<ul style="list-style-type: none"> • Distribution Provider • Transmission Owner
<ul style="list-style-type: none"> • Wholesaler 	<ul style="list-style-type: none"> • Purchase-Selling Entity