

Technical and Metering Requirements for Small Embedded Facilities

presented to

IESO Revenue Metering Sub-Committee

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Technical and Metering Requirements

- Proposed rule amendment MR-00261-R00 Technical and Metering Requirements for Small Embedded Facilities
 - *IESO staff believes that the market rules can be so amended and thereby reduce the barriers for small embedded generation and **load facilities** (emphasis added) with no material impact on the reliability of the IESO-controlled grid or on the efficient operation of the IESO-administered markets.*



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- The Background section to the amendment form states that:

Proponents of distributed generation and distributed demand management projects have requested the IESO to review its technical requirements and revenue metering requirements for small facilities. These proponents have identified the existing requirements as significant barriers to participating in the IESO administered markets.

...

*This RFP specifies that the minimum size for eligible projects would be 500 kW and that the proponent must become a market participant in the IESO-administered markets and comply with the market rules...It is expected that successful projects under this RFP will be small **embedded load** (emphasis added) and generation facilities.*



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- Despite, these statements in the preamble, the proposed rule amendment only addresses embedded generation.
- Should this rule be applied to generators, the same should apply to load customers for the following reasons:
 - Identical policy considerations as small generators
 - Reduce barriers to load customers from participating in the demand management initiatives introduced by the IESO (dispatch or day ahead markets) or the Ontario Energy Board.
 - Small embedded generators may require full IESO compliant station service (load) metering (no exemption for station service load).



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- Without undue technical restrictions, load facilities may:
 - more readily participate in the wholesale market, and
 - engineer the metering and communications to meet their energy management needs across all their facilities
- Consequences for meter failure are clearly defined in the Market Rules:
 - use of *metering data* for *settlement* purposes that most closely reflects the flow of *energy* during the applicable intervals using a multiplier, or application of the estimation process
- Now is the time to make the amendment while stakeholders and the Technical Panel are focused on the issue and demand management initiatives are being developed



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– Other reasons?



Thank you



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