



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: <u>Great Lakes Power Limited - Distribution Division</u>	
Market Participant/Metering Service Provider No. (if applicable): _____	IMO Help Centre (IHC) Ticket No. (if applicable): _____
Address: <u>2 Sackville Road</u>	
City/Town: <u>Sault Ste. Marie</u>	Province/State: <u>ON</u>
Postal/Zip Code: <u>P6B 6J6</u>	Country: <u>Canada</u>
Fax No.: <u>705-941-5600</u>	
Email Address: <u>rreid@glp.on.ca</u>	
Main Contact	
Name: <u>Janis Gartshore</u>	
Telephone No.: <u>705-941-5657</u>	Fax No.: <u>705-759-2218</u>
E-mail Address: <u>jcgartshore@glp.on.ca</u>	
Web Site (URL): <u>www.glp.on.ca</u>	
Alternative Contact	
Name: <u>Rob Reid</u>	
Telephone No.: <u>705-941-5647</u>	Fax No.: <u>705-941-5600</u>
E-mail Address: <u>rreid@glp.on.ca</u>	

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 (d) & (f)

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.

This facility was 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 of the Wholesale Revenue Metering Standard that requires separate potential transformers for every meter point. The applicant is requesting approval for the use of bus potential transformers to be shared among different metering points. The Measurement Canada approved potential transformers will be operating within their rated burdens. The applicant is requesting this exemption as it relates to new and existing meter points established in existing facilities.

The individual measurement of voltage at each adjacent meter point on a common bus will yield the same result as a single bus voltage measurement. The estimated cost of complying with this requirements is excessive due to the number of potential transformers required and physical space limitations in and adjacent to existing switchgear and associated apparatus.

The granting of this exemption would not have an adverse affect on the market or other participants due to the fact that the shared potential transformers will be operating within their rated burdens and will be approved by Measurement Canada for revenue billing applications.

The meter point ID's for which the applicant is requesting an exemption are:

DAWATSON T1 ID #106173
DA WATSON T2 -GLP ID #106175
DAWATSON T2 ID #106174
HIGHFALLS ID #106158
MCPHAIL1 ID #106163
MCPHAIL2 ID #106164
SCOTT1 ID #106166
SCOTT2 ID #106167
ST. MARY'S PAPER #106171

PART 3 – SUBMISSIONS IN SUPPORT OF EXEMPTION APPLICATION

ST. MARY'S PAPER #106172
ST. MARY'S (PUC) #106193
TARENTORUS (PUC) #106194

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