



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 /
Metering Service Provider No.*¹: _____

Market Participant Class: _____

Telephone: 905.855.6464

Fax: _____

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

PART 2 – MARKET RULE AMENDMENT SUBMISSION INFORMATION

Subject: Ontario Power System Restoration Plan

Title: Emergency Preparedness and System Restoration – Align Restoration Related Market Rules with Industry Practice

Nature of Request (please indicate with x)

☒ Alteration

☐ Deletion

☐ Addition

☐ Clarification

Chapter: 5, 11

Appendix: _____

Sections: 11.3,

Sub-sections proposed for amending/clarifying: 11.3.7.1 and 11.3.7.3 and definition

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*.

The North East Power Coordinating Council (NPCC) is designated as the regional compliance monitor for the mandatory reliability standards of the North American Electric Reliability Corporation (NERC). The NPCC has implemented a self certification process as a means for its members to satisfy their reliability obligations. In this self certification process, the NPCC defines reliability criteria that member organizations must satisfy to be in compliance. The member organizations then certify to the NPCC that they acknowledge the criteria and are in compliance with their reliability obligations. The NPCC retains the authority to audit members to verify their self certifications.

The IESO, as the reliability coordinator for Ontario, self certifies to the NPCC that Ontario is meeting its reliability obligations and enforces reliability standards in Ontario. To assist market participants in meeting their reliability obligations, the IESO has created the IESO Reliability Compliance Program (IRCP). The IRCP is being used for all NPCC related reliability obligations, including restoration related obligations for restoration participants.

The IESO, as part of its annual review of the Ontario Power System Restoration Plan has formed a sub team of the EPTF (Emergency Preparedness Task Force) to consult with stakeholders and revise the restoration plan where appropriate. The OPSRP details the technical requirements to expediently restore the IESO-controlled grid after a partial or complete blackout. The OPSRP review team has targeted Baseline 18.0 (September 2007) for completion of the revisions to the OPSRP, including any necessary changes to the market rules.

The OPSRP revision team includes representatives from Brookfield Power, Bruce Power, Hydro One Networks, OPG, PowerStream and Waterloo North Hydro. All restoration participants (approximately 96 market participants) will be consulted for their input prior to finalizing the draft. This process is being undertaken with the goals of making the Restoration Participant Attachment administrative processes more efficient and minimizing the administrative burden on participants and the IESO where reliability considerations make this possible. The review of the OPSRP reflects a shift in industry practices from a standard of records and schedule submission to a new standard of self certification.

Currently restoration participants are required to submit a three year schedule of system restoration training activities and a schedule for testing the restoration participant's equipment. Consistent with the industry move to self-certification, it is more appropriate for restoration participants to perform their prescribed duties and fulfil their obligations in accordance with the OPSRP, maintain the appropriate records, submit their Restoration Participant Attachment to the IESO and self-certify to the IESO via the IESO Reliability Compliance Program (IRCP) that they are meeting their OPSRP obligations.

The IESO still retains the ability to verify compliance and to ensure that participants are fulfilling their obligations through an audit process (refer to existing section 11.4 of Chapter 5 of the market rules).

The existing definition of restoration participant utilizes the term "restoration related breaker" as the criteria for determining a restoration participant. The definition of a restoration related breaker was removed in a previous market rule amendment and the definition of restoration participant needs to be updated. Also, the criteria for determining whether a market participant is a restoration participant has evolved from simply whether or not there is a "restoration related breaker".

PART 4 – PROPOSAL (BY SUBMITTER)

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

The market rules (section 11.3.7.1 of Chapter 5) should be amended to replace the obligation upon restoration participants to submit a three year schedule of system restoration training activities with an obligation on restoration participants to self certify that they have performed the necessary training in accordance with the OPSRP.

The market rules (section 11.3.7.3 of Chapter 5) should be amended to replace the obligation upon restoration participants to submit a three year schedule for testing their equipment with an obligation to certify that they have successfully completed the appropriate testing in accordance with NPCC criteria and the OPSRP.

The definition of a *restoration participant* should be amended to refer to criteria in the OPSRP. These criteria were developed with extensive stakeholder consultation through the review process of the OPSRP. The criteria in the OPSRP are lengthy and complex. They specify distinct criteria for generation and consumer market participants and are also dependent upon their respective size and connection to the grid. Due to the length and complexity of the criteria it is proposed that the criteria for determining a *restoration participant* reside in the OPSRP. Changes to the OPSRP are subject to extensive stakeholder consultation, as evidenced by the existing exercise that identified the need for these rule amendments.

PART 5 – FOR IESO USE ONLY

Technical Panel Decision on Rule Amendment Submission: _____

MR Number: MR-00334-Q00_____

Date Submitted to *Technical Panel*: April 26, 2007

Accepted by *Technical Panel* as: (please indicate with x)

Date:

☒ General

☐ Urgent

☐ Minor

May 1, 2007

Criteria for Acceptance:

The amendment submission attempts to reduce participant and IESO costs. The amendment proposes to reduce the administrative burden upon participants thereby reducing the costs to satisfy their restoration related obligations. A consequence of reducing the administrative burden upon restoration participants is reducing the requirement upon the IESO to collect, store and review submitted documentation thus reducing administrative costs of the IESO.

The expected or perceived benefits of the amendment exceed the costs of implementation. As the implementation costs are expected to be small the benefits, through reduced administrative costs, are expected to exceed the costs of this amendment_____

Priority: High

PART 5 – FOR IESO USE ONLY

Criteria for Assigning Priority: Pervasiveness of the problem; there are currently over 90 market participants that are restoration participants that would potentially benefit by the proposed rule amendment.

A high priority would also result in rule amendments being approved and implemented concurrently with the other planned changes to the Ontario Power System Restoration Plan.

Not Accepted (please indicate with x): ☐

Clarification/Interpretation Required (please indicate with x): ☐

Technical Panel Minutes Reference: IESOTP 201-1

Technical Panel Comments: _____