

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: <u>IESO Staff</u>		
(if applicable) <i>Market Participant / Metering Service Provider</i> No. ¹ : <u>N/A</u>	Market Participant Class: N/A	
Telephone: 905-403-6983	Fax: 905-855-6371	
E-mail Address: Rule.amendments@ieso.ca		

PART 2 – MARKET RULE AMENDMENT SUBMISSION INFORMATION

Subject: Emergency Preparedness I	lans			
Title: Market Participant Obligation Regarding an Emergency Preparedness Plan				
Nature of Request (please indicate v	vith x)			
	☐ Addition	☐ Clarification		
Chapter: 5, 11 Appendix	:	Sections: <u>Ch 5, 10.3.6, 10.4.11, 11.2.3,</u> <u>11.3.5, 11.4.3, 11.4.3.1, 11.4.3.2, 11.4.4.2, Ch 11 definitions</u>		

¹ This number is a maximum of 12 characters and does not include any spaces or underscore.

PART 1 – SUBMITTER'S INFORMATION

Sub-sections proposed for amending/clarifying:	
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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*.

Summary

It is proposed to amend the market rules to limit a market participant's obligation to annually certify their emergency preparedness plan (EPP) to only restoration participants¹.

In addition, it is proposed to replace references to the retired "Electricity Emergency Priority – Policy" with references to the applicable market manual or to the "Ontario Electricity Emergency Plan."

Background

Section 39 of the *Electricity Act*, 1998² provides the statutory requirements on the IESO and market participants for emergency planning in Ontario's electricity sector. The Ministry of Energy and the IESO are the organizations responsible for emergency planning among market participants and ensuring that emergencies affecting the reliable supply of electricity in Ontario are dealt with in a coordinated and timely manner. The Ontario Electricity Emergency Plan (OEEP)³, which supersedes the retired "Electricity Emergency Priority – Policy," describes how the emergency planning requirements of the *Electricity Act* (1998) and the market rules are met. The Ontario Power System Restoration Plan (OPSRP)⁴ provides the response framework for the IESO and market participants to recover Ontario's integrated power system as well as the general obligations and the defining criteria for restoration participants.

Currently, the market rules require all market participants, regardless of size or impact to the ICG to submit an EPP to the IESO for annual review. Market participants are required to review at least annually their EPP and provide annual certification to the IESO that either their EPP has not changed, or if it has changed, that it conforms to OEEP criteria and that all required training and drills have been completed. The IESO is then required to review each EPP submitted and prepare a record of review indicating any required changes to be made by the participant – once changed, the EPP must be resubmitted to the IESO for review. This imposes an administrative burden/cost to the IESO and to market participants that is not commensurate with the risk that is being mitigated.

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¹ Market Rules, Ch 11 definition: *restoration participant* means a *market participant* who has been identified by the *IESO* as having equipment or *facilities* that: (i) are directly connected to the *IESO-controlled grid* and (ii) affect the restoration process as set out in the *Ontario power system restoration plan*;

² Electricity Act, section 39: Electricity Act, 1998, S.O. 1998, c. 15, Sched. A

³ Market Manual 7: System Operations Part 7.10: Ontario Electricity Emergency Plan http://www.ieso.ca/imoweb/pubs/ep/ontElecEmerPlan.pdf

⁴ The Ontario Power System Restoration Plan: http://www.ieso.ca/imoweb/pubs/systemOps/so_OntPowerSysRestorePlan.pdf

PART 3 – DESCRIPTION OF THE ISSUE

The proposed changes provide a reasonable framework that:

- Continues to facilitate the creation of effective EPPs (initially submitted and review by the IESO);
- Continue to ensure via the annual review, that EPPs for restoration participants meet the requirements specified in the market rules; and
- Continues to provide the IESO the discretion to direct any market participant to conduct additional testing or an independent audit of their EPP.

PART 4 - PROPOSAL (BY SUBMITTER)

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

It is proposed to amend the market rules to limit a market participant's obligation to annually certify their EPP to only restoration participants

In addition, it is proposed to replace references to the retired "Electricity Emergency Priority – Policy" with references to the applicable market manual or to the "Ontario Electricity Emergency Plan."

PART 5 - FOR IESO USE ONLY

Technical Panel Decision on Rule Amendment Submission: Warrants Consideration			
MR Number: MR-00383			
Date Submitted to Technical Panel: August 16, 2011			
Accepted by <i>Technical Panel</i> as: (please indicate with x)	Date:		
☐ General ☐ Urgent ☐ Minor	August 23, 2011		
Criteria for Acceptance: The amendment submission will reduce the administrative burden and costs on market participants and the IESO caused by the current requirement for all market participants, regardless of size or impact to the ICG to submit an EPP for review and certification annually to the IESO.			
Priority: Regular			
Criteria for Assigning Priority: The IESO has started the stakeholdering process on the proposed changes with the Emergency Preparedness Task Force in advance of the requirement for all market participants to annually certify their EPPs in 2012.			

PART 5 – FOR IESO USE ONLY

Not Accepted (please indicate with x):		
Clarification/Interpretation Required (please indicate with x):		
Technical Panel Minutes Reference: IESOTP 253-1		
Technical Panel Comments:		