



Market Rule Amendment Submission

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@theIMO.com

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 *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 submitted information will be assigned the confidentiality classification of "public" upon receipt. You should be aware that the *IMO* 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: IMO Staff	
(if applicable) <i>Market Participant / Metering Service Provider No.</i> ¹ :	<i>Market Participant Class:</i>
Telephone: 416 506-2801	Fax: 416-506-2847
Email Address: rule.amendments@theimo.com	

PART 2 – MARKET RULE AMENDMENT SUBMISSION INFORMATION

Subject: Connection Assessments
Title: Simplifying Connection Assessment Market Rules
Nature of request (please indicate with X): <u>X</u> Alteration __ Deletion __ Addition __ Clarification
Chapter: 4 Appendix: Sections: 6.1
Sub-sections proposed for amending/clarifying : 6.1.1 to 6.1.23 (inclusive), 6.4.2A, 7.1.

¹ This field is restricted to a maximum of 12 characters and does not allow 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 *IMO-administered markets*. Include the Chapter and Section number of the relevant market rules.

Section 6.1 of Chapter 4 articulates the obligations of the IMO and connection applicants relevant to the establishment of a new connection to the IMO-controlled grid or to the modification of an existing connection to the IMO-controlled grid. Under the existing rules the IMO must conduct an assessment to determine the potential impact of a new or modified connection on the reliability of the integrated power system before such a new or modified connection can be undertaken.

The market rules, because of their current structure and detail require the IMO to make market rule amendments in order to change purely procedural aspects of the existing Connection Assessment and Approval (CAA) process. When the connection assessment rules were written there were no connection assessment procedures in place, therefore, the rules are very prescriptive with respect to the CAA process. Subsequently, CAA procedures have been developed that include all market rules requirements.

The purpose of this market rule amendment submission is to suggest that section 6 of Chapter 4 be revised to facilitate the evolution of the connection assessment process and procedures while retaining the market rule obligations on both the IMO and the connection applicant. The market rules should enable and authorize, rather than prescribe, the connection assessment process and procedures. Under this proposal all of the existing procedural elements in the market rules would be simply relocated to the market manual.

Also, embedded within the connection assessment rules are rules that are more directly related to the provision of connection-related information, not the CAA process itself, therefore the IMO believes these rules should be moved to a different part of the market rules.

Amending the market rules as suggested would simplify the process for evolving the connection assessment process in response to the needs of the market. The expected benefit would be a more flexible and efficient connection assessment process and evolution, at little additional cost to market participants and the IMO.

PART 4 – PROPOSAL (BY SUBMITTER)

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

<p>The proposal is to:</p> <ul style="list-style-type: none"> • Modify section 6.1 of Chapter 4 by removing the references to a preliminary assessment and a system impact assessment and replacing them with a newly defined term, connection assessment. This will make the rules less prescriptive and allow for more flexible connection assessment procedures in future; • Delete the existing definitions in Chapter 11 for preliminary assessment and system impact assessment; • Insert a new defined term “connection assessment” which would be defined in such a manner as to allow procedural flexibility in regards to how connection assessments are conducted; • Relocate sub-sections 6.1.11, 6.1.12, and 6.1.13, which deal with the provision of connection related information, to section 7.1 of Chapter 4. This latter section is the appropriate place for these obligations as it contains the general obligations related to provision of connection related information; • Revise sections 6.1.14 and 6.1.16 retaining the essential market rule obligations in these sections while removing the purely procedural elements from the market rules and retaining these in the associated market manual; • Revise other provisions of section 6 so that the market rules enable and authorize, rather than prescribe, the connection assessment process and procedures; • Make a consequential amendment to sub-section 6.4.2A.3 of Chapter 4 that follows from the deletion of the defined terms preliminary assessment and system impact assessment – replacing these terms with connection assessment and, • Revise section 6.1.12 to correct a discrepancy between this section and Part A of Appendix 4.6 by changing 20 MVA to 10 MVA.
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PART 5 – FOR IMO USE ONLY

<i>Technical Panel Decision on Rule Amendment Submission</i>	
MR number: MR-00213-Q00	
Date submitted to <i>Technical Panel</i>: December 3, 2002	
Accepted by <i>Technical Panel</i> as: <input checked="" type="checkbox"/> General <input type="checkbox"/> Urgent Minor (please indicate with X)	Date:
Criteria for acceptance: (h) It identifies ways to simplify the market and/or reduce participant or IMO costs; (j) The expected or perceived benefits of the amendment exceed the expected or perceived costs of implementation.	
Priority: Medium	

PART 5 – FOR IMO USE ONLY

Criteria for assigning priority: Practical consequences: the extent to which a solution is likely to be acceptable generally, and the extent to which addressing a particular issue might cause others to act.

Not accepted (please indicate with X):

Clarification/interpretation required (please indicate with X):

Technical Panel minutes reference: IMOTP 118-1

Technical Panel Comments:

The Technical Panel believes the amendment submission warrants further consideration.

The Technical Panel invites written submissions on the amendment submission in the time period commencing December 9, 2002 and ending December 23, 2002.

The Technical Panel has recommended that the amendment submission also be stakeholdered before the Market Operations Standing Committee.

The Technical Panel is particularly interested in obtaining comments related to two key issues:

- **The extent to which the System Impact Assessment conducted by the IMO and the Customer Impact Study conducted by Hydro One could occur in parallel; and,**
- **The respective roles of the Ontario Energy Board and the IMO in regard to the allocation of costs associated with connection assessment related activities.**