

## PART 1 – MARKET RULE INFORMATION

Identification No.: MR-00279-R00						
Subject:	Revenue	evenue Metering				
Title:	Metering Installations Whose Registration Expires at End of 2004					
Nature of Proposal:			Deletion		Addition	
Chapter:	6			Appendix:		
Sections:	2					
Sub-sections proposed for amending:			2.1.1.3			

## PART 2 – PROPOSAL HISTORY

Version	Reason for Issuing	Version Date	
1.0	Submit for Technical Par	nel Review	18 Aug 04
2.0	Published for Stakeholde	r Review and Comment	25 Aug 04
3.0	Submit for Technical Par	nel Recommendation	16 Sep 04
4.0	Recommended by Techn for IMO Board Approval	21 Sep 04	
5.0	Approved by IMO Board		8 Oct 04
Approved Amendment Publication Date:		12 Oct 04	
Approved Amer	ndment Effective Date:	8 Dec 04	

Provide a brief description of the following:

- The reason for the proposed amendment and the impact on the *IMO-administered markets* if the amendment is not made
- Alternative solutions considered
- The proposed amendment, how the amendment addresses the above reason and impact of the proposed amendment on the *IMO-administered markets*.

#### **Summary**

It is proposed to permit the IMO to use, for settlement purposes, metering installations whose registration has expired provided that the IMO determines that the continued use of these metering installations is necessary for the efficient operation of the IMO-administered markets.

These rule amendments are necessary to address the impending situation where it is estimated that approximately 300 revenue metering installations whose registration shall expire at the end of 2004 because they will not have been upgraded by the applicable metered market participant to the required standard by that time. Settlement of the IMO-administered markets would be severely disrupted if these metering installations cannot be used.

The obligation on the metered market participant to upgrade the metering installations remains in the market rules and the failure of the metered market participant to meet this obligation by the end of 2004 will be treated as a market compliance matter.

The proposed rules are drafted to address the specific situation facing the market at the end of 2004, and also any similar situation that may arise in the future.

#### **Background**

There are approximately 700 metering installations currently registered under the alternative metering standard that will have their seals expire or lose their Measurement Canada temporary dispensation<sup>1.</sup> by the end of 2004. The market rules require that any metering installation currently registered under the alternative metering standard that undergoes a seal expiry (of the meter) has to be upgraded to the enduring metering standard (chapter 6 section 4.4.1A). While work is progressing on upgrading these metering installations, as of early July 2004, 543 of these metering installations had not been upgraded. Based on the upgrading progress to date, the IMO estimates that approximately 300 of these metering installations will not be upgraded by the end of 2004. This represents approximately 17% of the total number of metering installations in the IMO-administered markets. The registration of these metering installations that are not upgraded (i.e. brought into compliance with the enduring metering standard) by the end of 2004 will expire at that time (chapter 6 section 4.4.5).

Under the current market rules (chapter 6 section 6.1.1 and chapter 9 section 2.1.1), starting on January 1, 2005, the IMO would not be permitted to effect settlements for the delivery points associated with those metering installations that are no longer registered.

1. A number of revenue metering installations whose seals expired in 2003 were granted temporary dispensation by Measurement Canada to allow the meters to be used for settlement purposes to the end of 2004. Refer to MR-00249-R00-R02 for further details on this temporary dispensation and resulting market rule amendments that extended their registration to the end of 2004.

The market rules allow that the upgrade of the metering installation upon seal expiry may vary from the minimum, which is a "meter only" change using a conforming meter, to a full upgrade bringing the installation into full compliance with chapter 6 of the Market Rules. Upgrading is the responsibility of the metered market participant (MMP).

Measurement Canada (MC), under the Electricity & Gas Inspection Act (the "E&GIA"), holds the "contractor" responsible for replacing seal expired meters as required by the E&GIA. MC has stated that Hydro One Networks retains the responsibilities attributed to a contractor for those meters for which it is currently the contractor and whose seals expire in 2003 and 2004. To meet this responsibility, Hydro One Networks is planning to replace all the meters for which it is the contractor and for which it is concerned will not be upgraded by the applicable MMP by the end of 2004, with "like-for-like" meters. These "like-for-like" meters would be exactly the same as the existing meters and would satisfy the E&GIA requirements. However these meters would not meet the enduring metering installation standards of chapter 6 of the market rules.

#### **Discussion**

It is proposed to amend the market rules (chapter 6 and chapter 9) to allow the IMO to use for settlement purposes metering data from those metering installations whose registration has expired provided that the IMO determines that the continued use is necessary for the efficient operation of the IMO-administered markets. (Refer to R00 and R03). The criterion that the IMO would use in this determination would be that the IMO reasonably believes that the metering installation continues to provide accurate measurements. The IMO would make this determination on the basis that the metering installation continues to meet the normal validation checks and the metering service provider maintains the metering installation as per the market rules.

It is also proposed that the market rule obligation on the MMP to upgrade its metering installation(s) be retained. The MMP should be deemed non-compliant under the market rules until the metering installation is upgraded to the enduring standard. All other MMP, metering service provider and IMO permissions and obligations regarding these metering installations should also be the same as if these metering installation were registered.

Amendments are also proposed to clarify some provisions regarding the registration of revenue meters. First, it is proposed to clarify that a metering installation must remain registered in order for it to be used for settlement purposes, subject to proposed exception noted above. The current market rules could be interpreted to mean that a metering installation could be used for settlements if it that has been registered some time in the past, with no reference to whether or not the registration is still valid. (Refer to R00 and R01)

Secondly, it is proposed to clarify the applicable seal expiry date that would trigger the expiration of the registration of all metering installation registered under the alternate metering standard. Some of these metering installations, including the ones that are being replaced "like-for-like" and driving the need for the rest of this rule amendment, have had meters changed and been re-sealed without being upgraded to the enduring standard e.g. emergency failure of the meter. The applicable seal expiry date for expiration of registration is the date associated with the meter at the time of market commencement, not the seal expiry date of any replacement meter. This clarification is judged necessary to ensure that MMPs are aware that their obligation to upgrade the metering installation is tied to the expiry date associated with the meter at the time of market commencement. (Refer to R06).

A number of consequential rule amendments are necessary to include these non-registered metering installations in various aspects of the revenue metering and settlement framework. These nonregistered metering installations will for all intents and purposes be used as would a registered metering installation, and the market rules should reflect that. For example, metering registry (refer to R01 and R04) and metering database (refer to R02) references should include these non-registered metering installations. The definition of register wholesale meter (RWM) also needs to be changed so that the settlement activity references to RWMs in chapter 9 include these non-registered metering installations (refer to R05).

#### PART 4 – PROPOSED AMENDMENT

## Requirements for Metering 2. **Installations**

- 2.1.1 Subject to section 2.1.3, the *IMO* shall not permit a person to participate in the real-time markets or the procurement markets or to cause or permit electricity to be conveyed into, through or out of the IMO-controlled grid in respect of a connection point, other than an interconnection, or in respect of an embedded connection point unless the IMO is satisfied that:
  - 2.1.1.1 the connection point or embedded connection point has a metering *installation* that, subject to section 4.4, complies with the requirements of this Chapter and of any policy or standard established by the IMO pursuant to this Chapter;
  - 2.1.1.2 if the person is or will be the *metered market participant* for the metering installation referred to in section 2.1.1.1:
    - a. the person has entered into an agreement under section 3.1.2.2(a) in relation to the *metering installation* or is a registered *metering* service provider; and
    - b. if the person is also an *embedded market participant*, has advised the relevant *distributor* or *transmitter* of the entering into of the agreement referred to in section 2.1.1.2(a); and

#### 2.1.1.3 either

(a) such *metering installation* has been and continues to be registered with the IMO in accordance with the procedures referred to in section 6.1.2., or

(b) such *metering installation* has been registered with the *IMO* in accordance with the procedures referred to in section 6.1.2 and the registration has expired provided that the *IMO* determines that the continued use of the *metering installation* is necessary for the efficient operation of the *IMO-administered markets*.

- 2.1.3 Section 2.1.1 and 2.1.2 shall not apply in respect of a person, other than a person that is or will be the *metered market participant* for a *metering installation*, that demonstrates to the satisfaction of the *IMO* that it will for *settlement* purposes have allocated to it *metering data* by means of *physical allocation data* submitted by a *metered market participant* in accordance with section 2.4 of Chapter 9.
- 2.1.4 This Chapter applies in respect of a *metering installation* that measures the consumption of *energy* in accordance with section 2.1A.1 of Chapter 9.

PART 5 -	IMO	BOARD	COMMENTS

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## PART 1 – MARKET RULE INFORMATION

Identification No.: MR-00279-R01							
Subject:	Revenue	Revenue Metering					
Title:	Metering Installations Whose Registration Expires at End of 2004						
Nature of Proposal:			☐ Deletion		Addition		
Chapter:	6			Appendix:			
Sections:	6.1						
Sub-sections proposed for amending:			6.1.1; 6.1	.1A			

Version	Reason for Issuing	Version Date	
Approved Amendment Publication Date:			
Approved Amer	ndment Effective Date:		

Provide a brief description of the following:

- The reason for the proposed amendment and the impact on the *IMO-administered markets* if the amendment is not made
- Alternative solutions considered
- The proposed amendment, how the amendment addresses the above reason and impact of the proposed amendment on the *IMO-administered markets*.

Refer to MR-00279-R00.

This amendment proposes to permit the settlement use of metering installations whose registration has expired only if that the IMO determines that the continued use of the installation is required. The amendment also proposes to clarify that the metering installation registration must remain current.

#### PART 4 – PROPOSED AMENDMENT

# 6. Registration of Metering Installations and Metering Registry

## 6.1 Registration of Metering Installations

- 6.1.1 Subject to section 6.1.1A, nNo person shall use a metering installation for the measurement of energy for settlement purposes relating to the real-time markets or the procurement markets unless the metering installation has been registered by the IMO in accordance with this section 6.1 and that registration has not expired.
- 6.1.1A A person may only use a *metering installation* for the measurement of *energy* for *settlement* purposes relating to the *real-time markets* or the *procurement markets* if the *metering installation* has been registered by the *IMO* in accordance with this section 6.1 and the registration has expired provided that the *IMO* determines that the continued use of the *metering installation* is necessary for the efficient operation of the *IMO-administered markets*.

#### PART 5 – IMO BOARD COMMENTS

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## PART 1 – MARKET RULE INFORMATION

Identification No.: MR-00279-R02						
Subject:	Revenue	evenue Metering				
Title:	Metering Installations Whose Registration Expires at End of 2004					
Nature of Proposal:			Deletion		Addition	
Chapter:	6			Appendix:		
Sections:	10					
Sub-sections proposed for amending:			10.1.1			

Version	Reason for Issuing	Version Date
Approved Amer	ndment Publication Date:	
Approved Amer	ndment Effective Date:	

Provide a brief description of the following:

- The reason for the proposed amendment and the impact on the *IMO-administered markets* if the amendment is not made
- Alternative solutions considered
- The proposed amendment, how the amendment addresses the above reason and impact of the proposed amendment on the *IMO-administered markets*.

Refer to MR-00279-R00.

This consequential amendment proposes to require the IMO to include in the metering database, metering data from those metering installations whose registration has expired but the IMO has determined that continued use of the metering installation is required.

#### PART 4 - PROPOSED AMENDMENT

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## 10.1 Metering Database

10.1.1 The *IMO* shall establish and maintain a *metering database* containing *metering data* transferred from each *metering installation* registered with the *IMO* and each *metering installation* whose registration has expired but whose continued use has been determined by the *IMO* to be necessary for the efficient operation of the *IMO-administered markets*.

#### PART 5 – IMO BOARD COMMENTS

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## PART 1 – MARKET RULE INFORMATION

Identification No.: MR-00279-R03						
Subject:	Revenue	evenue Metering				
Title:	Metering Installations Whose Registration Expires at End of 2004					
Nature of Proposal:  Alteration			Deletion		Addition	
Chapter:	9			Appendix:		
Sections:	2.1					
Sub-sections proposed for amending:			2.1.1A			

Version	Reason for Issuing	Version Date	
Approved Amer	ndment Publication Date:		
Approved Amer	ndment Effective Date:		

Provide a brief description of the following:

- The reason for the proposed amendment and the impact on the *IMO-administered markets* if the amendment is not made
- Alternative solutions considered
- The proposed amendment, how the amendment addresses the above reason and impact of the proposed amendment on the *IMO-administered markets*.

Refer to MR-00279-R00.

This amendment proposes to clarify that the IMO may determine settlement amounts on the basis of metering installations whose registration has expired.

#### PART 4 – PROPOSED AMENDMENT

## 2.1 Metering and Metering Responsibilities

- 2.1.1 Subject to section 2.1.1A, every *meter* utilised for determining *settlement amounts* according to this Chapter must be a *registered wholesale meter (RWM)*.
- 2.1.1A Nothing in section 2.1.1 shall be construed as requiring the *IMO* to determine settlement amounts on the basis of an *RWM* in circumstances where it is permitted to use another meter for this purpose pursuant to section 3.1.4A or in circumstances where the *IMO* has determined that determination of settlement amounts using a metering installation whose registration has expired is required for the efficient operation of the *IMO*-administered markets.

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## PART 1 – MARKET RULE INFORMATION

Identification No.: MR-00279-R04						
Subject:	Revenue	Revenue Metering				
Title:	Metering Installations Whose Registration Expires at End of 2004					
Nature of Proposal:			☐ Deletion		Addition	
Chapter:	6			Appendix:	6.5	
Sections:	1.2; 1.4					
Sub-sections proposed for amending:			1.2.1; 1.4	.1		

Version	Reason for Issuing		Version Date
Approved Amer	ndment Publication Date:		
Approved Amer	ndment Effective Date:		

Provide a brief description of the following:

- The reason for the proposed amendment and the impact on the *IMO-administered markets* if the amendment is not made
- Alternative solutions considered
- The proposed amendment, how the amendment addresses the above reason and impact of the proposed amendment on the *IMO-administered markets*.

Refer to MR-00279-R00.

This amendment proposes to require the IMO to include in the metering registry information regarding metering installations whose registration has expired but but whose continued use has been determined by the IMO to be necessary for the efficient operation of the IMO-administered markets.

#### PART 4 – PROPOSED AMENDMENT

# **Appendix 6.5 – Metering Registry and Meter Point Documentation**

#### 1.1 Introduction

1.1.1 This Appendix sets forth certain of the information that is required to be contained in the *metering registry* and describes the *meter point* documentation that each *metered market participant* must provide to the *IMO* in support of an application to register a *metering installation*.

## 1.2 Metering Registry Information

1.2.1 The *IMO* shall ensure that the *metering registry* contains the following information respecting each registered *metering installation* and such other information as the *IMO* considers appropriate, including information respecting *metering installations* whose registration has expired but whose continued use has been determined by the *IMO* to be necessary for the efficient operation of the *IMO-administered markets*:

• • • •

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## 1.4 Other

1.4.1 The *IMO* shall ensure that the *metering registry* contains, in respect of each registered *metering installation* and *metering installations* whose registration has expired but whose continued use has been determined by the *IMO* to be necessary for the efficient operation of the *IMO-administered markets*.:, the identification number assigned by the *IMO* to the *defined meter point* for that *metering installation*.

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## PART 1 – MARKET RULE INFORMATION

Identification No.: MR-00279-R05		MR-00279-R05				
Subject:	Revenue	venue Metering				
Title:	Metering	Metering Installations Whose Registration Expires at End of 2004				
Nature of Proposal:			☐ Deletion	Addition		
Chapter:	11 - Definitions		Appendix:			
Sections:						
Sub-sections proposed for amending:						

Version	Reason for Issuing	Version Date	
Approved Amer	ndment Publication Date:		
Approved Amer	ndment Effective Date:		

Provide a brief description of the following:

- The reason for the proposed amendment and the impact on the IMO-administered markets if the amendment is not made
- Alternative solutions considered
- The proposed amendment, how the amendment addresses the above reason and impact of the proposed amendment on the IMO-administered markets.

Please refer to MR-00279-R00.

This amendment proposes to change the definition of registered wholesale meter (RWM) to include those metering installations whose registration has expired but the IMO determines that the continued use of the metering installation is necessary for the efficient operation of the IMO-administered markets.

#### PART 4 – PROPOSED AMENDMENT

registered wholesale meter or RWM means a meter that meets the criteria specified in Chapter 6 and that is registered with the IMO References to a registered wholesale meter or RWM within Chapter 9 also include *meters* in *metering installations* whose registration has expired but the IMO determines that the continued use of the metering installation is necessary for the efficient operation of the IMOadministered markets;

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## PART 1 – MARKET RULE INFORMATION

Identification No.: MR-00279-R06						
Subject:	Revenue	nue Metering				
Title:	Metering Installations Whose Registration Expires at End of 2004					
Nature of Proposal:			☐ Deletion		Addition	
Chapter:	6		Appendix:	6.1		
Sections:	1.1					
Sub-sections proposed for amending:			1.1.1.4			

Version	Reason for Issuing	Version Date	
Approved Amer	ndment Publication Date:		
Approved Amer	ndment Effective Date:		

Provide a brief description of the following:

- The reason for the proposed amendment and the impact on the *IMO-administered markets* if the amendment is not made
- Alternative solutions considered
- The proposed amendment, how the amendment addresses the above reason and impact of the proposed amendment on the *IMO-administered markets*.

Please refer to MR-00279-R00.

This amendment proposes to clarify that the seal expiry date that triggers the expiration of the registration of a metering installation is the date associated with the meter in place on the market commencement date.

#### PART 4 – PROPOSED AMENDMENT

# **Appendix 6.2 – Alternative Metering Installation Standards**

#### 1.1 Introduction

- 1.1.1 This appendix applies to *metering installations* in service on April 17, 2000, the date that Chapter 6, section 4.4 came into force or that are the subject of an application for registration filed prior to the *market commencement date* and in respect of which the major components were ordered or procured on or before May 17, 2000, being 30 days following the date of coming into force of Chapter 6, section 4.4. This Appendix sets forth:
  - 1.1.1.1 the alternative standards and accompanying conditions that must be met in respect of a *metering installation* registered pursuant to section 4.4.1 of this Chapter;
  - 1.1.1.2 the information that must be submitted by a *metering service provider* in support of an application for registration of *metering installations* referred to in section 4.4.1 of this Chapter;
  - 1.1.1.3 the circumstances in which the *IMO* may revoke registration granted pursuant to section 4.4.1 of this Chapter; and
  - 1.1.1.4 the time at which registration granted by the *IMO* pursuant to section 4.4.1 of this Chapter expires. Where the time at which

registration expires is specified to be the earliest expiry date of the seal period of any *meter* within the *metering installation*, that date shall be the earliest expiry date of the seal period of any *meter* within the *metering installation* on the *market commencement date*.

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