

# Compliance Quarterly Report

## Q3 2025

ISO Rules ..... 1

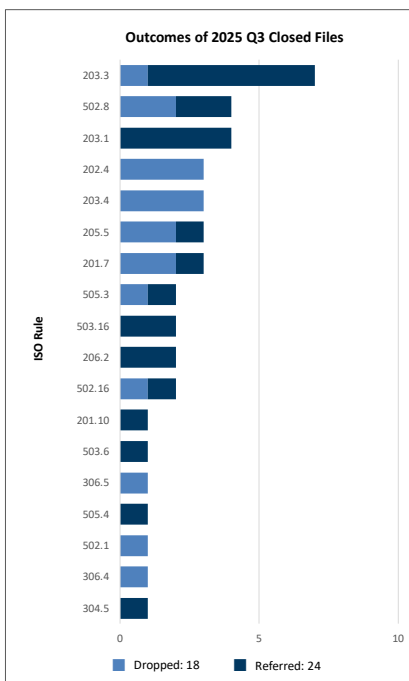
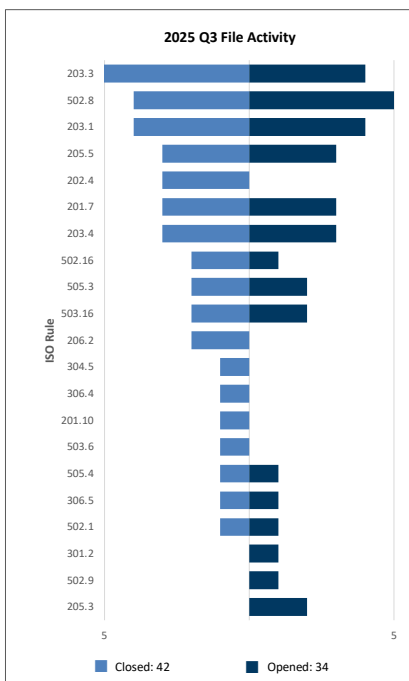
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## Compliance Quarterly Report - ISO Rules - 2025 Q3

The following charts summarize the activities of the ISO Rules External Compliance Monitoring group in Q3 of 2025 and the distribution of events over the past 4 quarters.

Please refer to the attached help documentation for details on interpreting the charts below. For any questions regarding this report, please send an email to [isorulescompliance@aeso.ca](mailto:isorulescompliance@aeso.ca).

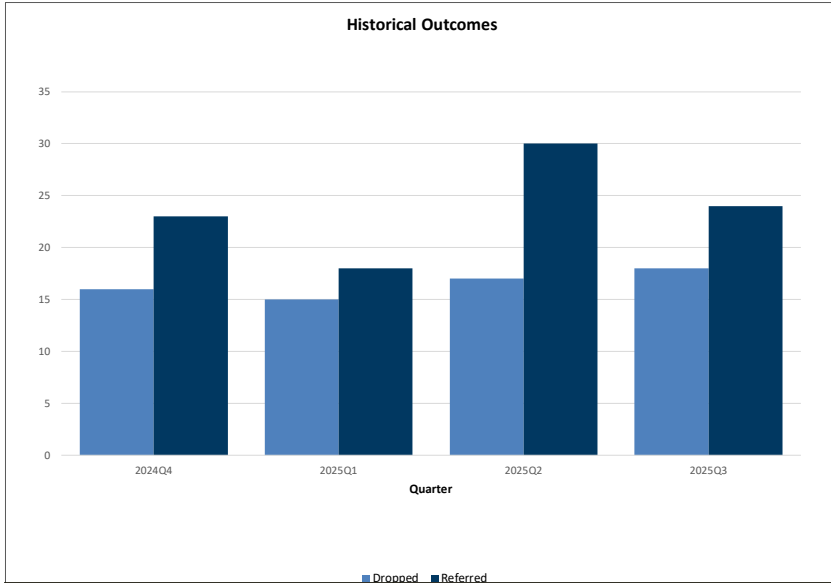


**Historical Referrals to MSA by Rule**

Rule	2024Q4	2025Q1	2025Q2	2025Q3
201.10	4	2		1
201.3			1	
201.7		4	1	1
203.1		1	2	4
203.3	4	1	9	6
203.4		2		
205.5			2	1
206.2				2
301.2	1	1	1	
304.5				1
306.4			1	
306.5		2	3	
502.16		2	1	1
502.6	1	1	1	
502.8	9		3	2
503.16	4	2	3	2
503.6				1
505.3			1	1
505.4			1	1

**Historical Referrals to MSA by Masked Participant**

Participant	2024Q4	2025Q1	2025Q2	2025Q3
P1		1		
P2	1			
P3		1		
P4				1
P5		1		
P6		1		
P7		1		
P8	1			
P9				1
P10	1			
P11		1		
P12				1
P13			2	
P14	1		1	
P15			1	
P16				1
P17	1			
P18	1			
P19			1	
P20	1			
P21		3	1	
P22			1	
P23				1
P24			1	
P25	1		2	2
P26	3			
P27			1	
P28	1			
P29		2		
P30		1		
P31			1	
P32			1	
P33				1
P34			1	1
P35				2
P36		2		
P37		2		
P38			1	
P39		1		
P40	1		1	
P41				1
P42	2			1
P43				1
P44			1	
P45	2			2
P46			1	3
P47	1		2	
P48			1	
P49	1		1	
P50	1		1	
P51	1		1	
P52	1		1	
P53				1
P54			1	2
P55	1			2
P56		1	1	1
P57			1	
P58			2	



There were 34 files opened during Q3 2025 and 42 files closed. Of the 42 files closed in the quarter, there were 24 referrals to the MSA of suspected contraventions. These referrals are distributed across 13 ISO rules.

The 95 referrals to the MSA for over the past 4 quarters are distributed across 58 market participants and 19 ISO rules.

*Note 1: As the AESO may refer multiple events in a single referral to the MSA, the AESO's count of referrals to the MSA may not match the MSA's count of AESO referrals, nor the count of penalties issued by the MSA in any given period from AESO referrals. Additionally, the ISO rules associated with case files may change over time such that the ISO rule identified at file open may differ from the ISO rule at file closed stages.*

*Note 2: This report includes all activities associated with the compliance monitoring of Section 9.1 of the ISO rules.*

**The AESO is developing new Alberta Reliability Standards Monitoring reporting in conjunction with the implementation of the Alberta Risk-Based Compliance Monitoring Program.**

Common Terminology	
<b>Category</b>	Each <b>Compliance File</b> has an associated Category which refers to the ISO rule, AUC Rule 021 topic or Reliability Standard which may have been contravened. In the case of multiple categories, a principle category is assigned to the File.
<b>Clarification Request</b>	An email request sent in the ISO Rules Compliance process seeking additional detail on the information submitted with an offer restatement. This is part of the ISO Rules <b>Monitoring</b> process.
<b>Compliance File</b>	A compliance file refers to one or more Flagged Events that have been logged for Preliminary Assessment, or where a suspected contravention has been identified through a Compliance Monitoring Audit in accordance with ISO Rule 103.12. Every Compliance File has a status of Open, Dropped or Referred. Each Compliance File is applicable to a single market participant and has an associated File Date and Category.
<b>Compliance Monitoring Audit</b>	As described in ISO Rule 103.12. The process of monitoring or review of a TFO's compliance with ISO Rule 9.1.5.
<b>Compliance Monitoring Audit Report</b>	A report described in ISO Rule 103.12.9 (4) which communicates the results of the Compliance Monitoring Audit to the TFO and provides support for any referral to the MSA.
<b>Date of Discovery</b>	For an <b>internal</b> or <b>external referral</b> , the date that the referral was received. For an event identified by <b>Monitoring</b> , the date on which the AESO discovers the event and logs it for <b>Preliminary Assessment</b> .
<b>Date of Notification</b>	The date that a TFO is notified of a Compliance Monitoring Audit of its transmission facility project and a request for information that facilitate commencement of the Compliance Monitoring Audit.
<b>File</b>	Synonym for <b>Compliance File</b> .
<b>File Date</b>	A unique date associated with a <b>Compliance File</b> . In the case of ISO rules compliance, this is the date of the <b>event</b> itself. In the case of AUC 021 monitoring, this is the <b>Date of Discovery</b> .
<b>Files Closed in Period</b>	Compliance Files whose <b>status</b> changed to either <b>Dropped File</b> or <b>Referred File</b> within the reporting period. Note that these may have file dates from earlier quarters.
<b>Files Opened in Period</b>	Compliance Files with a <b>Date of Discovery</b> falling within the reporting period.
<b>Flagged Event</b>	A collection of one or more submissions or actions carried out by a market participant that may form the basis of a compliance file. Flagged events can come from <b>Monitoring</b> , an <b>Internal Referral</b> or an <b>External Referral</b> or from <b>Clarification Requests</b> .
<b>Information Request</b>	As described in ISO Rule 103.12, an Information Request is a letter submitted to a market participant describing the particulars of a potential ISO rule, AUC 021 topic or Reliability Standard contravention and seeking the market participant's input on the event.
<b>Masked Participant ID</b>	A unique identifier associated with each market participant for tracking <b>Referred Files</b> for that participant but without revealing the particular participant. The Masked Participant ID will NOT be consistent from report to report.
<b>Masked Transmission Facility Owner (TFO)</b>	A unique identifier associated with each <b>TFO</b> for tracking Compliance Monitoring Audits for that participant but without revealing the <b>TFO</b> name. The Masked <b>TFO</b> ID will NOT be consistent from report to report.
<b>Monitoring</b>	Queries, reports and other tools run by Compliance on a regular basis to identify <b>Flagged Events</b> .
<b>Other</b>	A <b>Category</b> of Other applies to events which Compliance examined but did not prove to be associated with any potential rule contravention.
<b>Other Events</b>	Compliance monitoring activities, other than Compliance Monitoring Audit, in relation to ISO Rule 9.1.1 <i>Monthly Reporting</i> , ISO Rule 9.1.3.4 <i>Project Change Proposal</i> , and ISO Rule 9.1.3.6 <i>Final Cost Report</i> .
<b>Preliminary Assessment</b>	As described in ISO Rule 103.12. The process of carrying out a detailed examination of a potential ISO rule, AUC 021 topic or Reliability Standard contravention (which is separate from a Compliance Monitoring Audit). This starts with the opening of a Compliance File and culminates in a decision to: send an Information Request regarding the event to the relevant market participant; to conclude that the data does not support an assessment of non-compliance and to drop the event; or, potentially, to make a referral to the AUC or MSA.
<b>Referrals in Period</b>	Compliance Files which have been referred to the MSA/AUC (as appropriate) in the period. Note that these may have file dates from previous quarters.
<b>TFO Records</b>	Documents, correspondences and other records of information that support compliance with ISO Rule 9.1.5
<b>Warning Letter</b>	In certain cases where a Preliminary Assessment has not been carried out or does not support an assessment of non-compliance, a letter may be sent to one or more participants which clarifies the obligations of a particular rule.

Table Specific Terminology	
<b>Origin</b>	A <b>Compliance File</b> has an origin which is an indication of how the <b>Flagged Event</b> was identified eg. <b>Monitoring</b> , <b>SC Referral</b> , <b>OC Referral</b> , etc.
<b>CR</b>	A <b>File Origin</b> of CR indicates that the event resulted from a <b>Clarification Request</b> .
<b>External Referral</b>	A <b>File Origin</b> of External Referral is a possible ISO rule, AUC 021 topic or Reliability Standard contravention identified by individuals outside the AESO and referred to compliance for a more detailed examination.
<b>Internal Referral</b>	A <b>File Origin</b> of Internal Referral is a possible ISO rule, AUC 021 topic or Reliability Standard contravention identified by other (non-compliance) personnel in the AESO in the course of their own work and referred to compliance for a more detailed examination.
<b>Other</b>	A File Origin of type Other refers to events which Compliance examined but which were brought to our attention through untypical means such as a question from a market participant or an AESO IT problem report.
<b>Status</b>	The current state of a <b>Compliance File</b> . Either <b>Open File</b> , <b>Dropped File</b> or <b>Referred File</b> .
<b>Dropped File</b>	The status of a Compliance File which is closed but is not a Referred File. A File may be closed for a variety of different reasons including: unreliable data, AESO IT system problems, Mitigating Factors as defined in ISO Rule 103.12 or an assessment that no rule has been contravened. A dropped file may have resulted in a Warning Letter being sent.
<b>Open File</b>	The <b>status</b> of a <b>Compliance File</b> which has been opened but which has not yet been <b>Dropped</b> or <b>Referred</b> to the MSA/AUC.
<b>Referred File</b>	The status of a Compliance File for which a referral regarding the file has been made to the AUC/MSA in accordance with ISO Rule 103.12.