

February 17, 2023

To: The Market Surveillance Administrator, Market Participants and Other Interested Parties  
("Stakeholders")

**Re: Late Stakeholder Comments on Notice of Administrative Amendments to the ISO Rules in Pursuit of Red Tape Reduction ("Red Tape Administrative Amendments")**

On February 14, 2023, the Alberta Electric System Operator ("AESO") received late written comments on the Red Tape Administrative Amendments.

Comments were received from the following Stakeholder:

1. TransCanada Energy Ltd.

Thank you to all Stakeholders who participated in this ISO rules comment process.

Sincerely,

*Jackie Gow*

Legal Manager, ISO Rules and Alberta Reliability Standards  
Legal and Regulatory Affairs  
[rules\\_comments@aeso.ca](mailto:rules_comments@aeso.ca)



<p><b>Period of Comment:</b> January 17, 2023 through February 7, 2023</p> <p><b>Comments From:</b> TransCanada Energy Ltd. (TCE)</p> <p><b>Date:</b> 2023/02/07</p>	<p><b>Contact:</b> Mark Thompson</p> <p><b>Phone:</b> 403-589-7193</p> <p><b>Email:</b> markj_thompson@tcenergy.com</p>
--	---

Instructions:

1. Please fill out the section above as indicated.
2. Please refer back to the “related material” on the Stakeholder Engagement page on the AESO website.
3. Please identify which ISO Rule and section you have comments for (if any) and place your comments/reasons for position in the appropriate column. Unidentified Rules will be interpreted as favourable comments.

Red Tape Administrative Amendments		
Table A: Removes a provision of the ISO Rule because it is no longer required		
ISO Rule	Subsection	Stakeholder Comments
203.6	6(4)	<p>The language contained in blacklined versions of this section from Appendix “A” and the Red Tape Administrative Amendments does not read properly and are inconsistent with the language contained in the clean version of the Red Tape Administrative Amendments. Please confirm that the language contained in the clean version is as was intended.</p> <p>TCE agrees that adding the words “other than” removes an unnecessary requirement for pool participants. However, TCE submits that the AESO should go further by removing another unnecessary pool participant requirement. TCE understands that the AESO is a party to all eTags for interchange transactions into/out of Alberta, and as such has the same visibility to curtailments (or reloads) issued by any transmission service provider that is party to the eTag. TCE also understands that the AESO does not rely on the ETS system for the purpose of operating the AIES. Placing an obligation on pool participants to submit AC restatements via ETS to inform the AESO of information it has already received is inefficient and unnecessary. In the interest of red tape reduction, TCE submits that subsection 6(4) should be amended to remove any obligation on pool participants to restate the AC of source or sink assets in response to curtailments or reloads.</p>



Red Tape Administrative Amendments		
Table B: Updates drafting style of the ISO Rule		
ISO Rule	Subsection	Stakeholder Comments
Multiple Rules	Multiple subsections	The AESO proposes to replace the phrase “as soon as reasonably practicable” with “as soon as practicable” stating that the “[c]ourts have confirmed the equivalency”. Please provide the associated reference(s) to the court decision(s).