

January 17, 2023

To: The Market Surveillance Administrator, market participants, and other interested parties
("Stakeholders")

Re: Notice of Administrative Amendments to the ISO Rules in Pursuit of Red Tape Reduction ("Red Tape Administrative Amendments")

Pursuant to Alberta Utilities Commission Rule 017, *Procedures and Process for Development of ISO Rules and Filing of ISO Rules with the Alberta Utilities Commission* ("AUC Rule 017"), the Alberta Electric System Operator ("AESO") is providing notice and seeking feedback from the Stakeholders on the Red Tape Administrative Amendments set out in Appendix "A" to this notice.

Issue

The ISO rules contain provisions that are no longer required. In several instances, the ISO rules also contain typographical errors, outdated cross references, and inconsistencies in how requirements are expressed.

Objectives

The AESO is seeking to achieve the following objectives through the Red Tape Administrative Amendments:

- (i) Remove regulatory requirements in the ISO rules that are no longer required. In support of the Government of Alberta's *Red Tape Reduction Initiative*, the AESO is committed to reducing regulatory requirements by one-third by Q2 2023.
- (ii) Correct typographical errors and outdated cross references.
- (iii) Establish greater drafting consistency across ISO rule requirements to enhance the uniformity, interpretation, and navigation of regulatory requirements. This includes aligning the language of requirements to a common format that identifies the obligation and the entity responsible for it.

Appendix A contains a description of how each proposed amendment meets the definition of "administrative amendment" in subsection 9.1(a) of AUC Rule 017:

"administrative amendment" means an amendment to an existing ISO rule that:

- (i) Corrects typographical errors, corrects or makes address or name changes, corrects or updates cross references, updates drafting style to align with current ISO drafting principles, or clarifies the language of the ISO rule without changing its effect;
- (ii) Adopts or incorporates by reference, without material change, legislative statutes or regulations;
- (iii) Adopts or amends content explicitly and specifically dictated by legislative statutes or regulations; or
- (iv) Removes a provision of the ISO rule because it is no longer required

Proposed Consultation and Timeline

Considering the nature of the ISO rule revisions, the AESO is: (i) targeting a condensed Stakeholder consultation for the Red Tape Administrative Amendments; and (ii) proposing a written process as indicated in the table below¹:

Target Date	Consultation Step
January 17, 2023	Red Tape Administrative Amendments posted
February 7, 2023	Stakeholder comments on Red Tape Administrative Amendments due
February 28, 2023	AESO written responses to Stakeholder comments posted
Q1 2023	Application filed with the Commission, if: (i) no opposing comments are received; or (ii) opposing comments received are withdrawn.

The AESO is committed to maintaining a flexible approach and may alter the consultation steps if there is a more effective and efficient way to manage priorities and achieve objectives.

Stakeholder Comments

Stakeholders may submit written comments to the AESO using the *Stakeholder Comment Matrix – Red Tape Administrative Amendments* when submitting comments to the AESO.

The deadline for Stakeholders to provide comments, as noted above, is **February 7, 2023** to rules_comments@aeso.ca. When submitting comments to the AESO, Stakeholders should ensure that comments provided represent all interests within their organization. The AESO will publish all Stakeholder comments received by the deadline.

Related Materials

The following documents are posted on the Stakeholder Engagement page on the AESO website:

1. *Stakeholder Comment Matrix – Red Tape Administrative Amendments*;
2. *Appendix “A” Red Tape Administrative Amendments*;
3. Blackline of Red Tape Administrative Amendments; and
4. Clean copy of Red Tape Administrative Amendments.

If you have any questions, please submit them to rules_comments@aeso.ca.

Sincerely,

Jackie Gow

Legal Manager, ISO Rules and Alberta Reliability Standards
Legal and Regulatory Affairs

¹ Please note that this letter was updated on January 19, 2023 to reflect changes in the proposed consultation and timeline table.