

July 29, 2019

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

Re: Stakeholder Comments on Letter of Notice for Development – Proposed Amended Section 502.2 of the ISO rules, *Bulk Transmission Line Technical Requirements* ("Section 502.2")

Pursuant to Section 5.2 of Alberta Utilities Commission Rule 017, *Procedures and Process for Development of ISO Rules and Filing of ISO Rules with the Alberta Utilities Commission*, written comments received from Stakeholders in response to the Alberta Electric System Operator's ("AESO") July 9, 2019, [Letter of Notice for Development](#) have been posted on the AESO website.

The following grid is hyperlinked to provide assistance in directing Stakeholders to these written comments.

Section 502.2
AltaLink Management Ltd
ATCO Electric Ltd
Consumers' Coalition of Alberta

Thank you to all stakeholders who participated in this part ISO rules comment process. All written comments received will be considered in the AESO's development of the proposed Section 502.2.

Sincerely,

"Melissa Mitchell-Moisson"

Melissa Mitchell-Moisson
Regulatory Administrator
Legal & Regulatory Affairs
rules_comments@aes0.ca
403-539-2948

Stakeholder Comment Matrix – July 9, 2019

Development of Proposed Amended Section 502.2 of the ISO rules, Bulk Transmission Line Technical Requirements (“Section 502.2”)



Period of Comment: July 9, 2019 through July 25, 2019 Comments From: AltaLink Date: 2019/07/19	Contact: Jenette Yearsley Phone: 403-387-8275 Email: Jenette.Yearsley@AltaLink.ca
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Instructions:

1. Please fill out the section above as indicated.
2. Please refer back to the Consultation Letter under the “Attachments” section to view materials related to the proposed amended Section 502.2
3. Please respond to the questions below and provide your specific comments (if any). Blank boxes will be interpreted as favourable comments.

The AESO is seeking comments from Stakeholders on the development of proposed amended ISO rule Section 502.2 with regard to the following matters:

	Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
1.	Do you agree or disagree that the issue identified requires the development of proposed amended Section 502.2? Please comment.	Agree.
2.	Do you agree or disagree with the potential objective or purpose of proposed amended Section 502.2? Please comment.	Agree.
3.	Do you agree or disagree with the proposed form of consultation and timelines? Please comment.	Agree. AltaLink encourages that the consultation occurs at the earliest opportunity and should include working group sessions in addition to any webinars or written feedback.
4.	Do you intend to participate in any related consultation? OR Do you agree that no consultation group is required for this rule development? Please comment.	AltaLink intends to participate in any related consultation.
5.	Do you have any additional comments?	No.

Stakeholder Comment Matrix – July 9, 2019

Development of Proposed Amended Section 502.2 of the ISO rules, Bulk Transmission Line Technical Requirements (“Section 502.2”)



Period of Comment: July 9, 2019 through July 25, 2019 Comments From: ATCO Electric Date: [2019/07/10]	Contact: Dan Bamber Phone: 780 918-0986 Email: Dan.bamber@atco.com
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Instructions:

1. Please fill out the section above as indicated.
2. Please refer back to the Consultation Letter under the “Attachments” section to view materials related to the proposed amended Section 502.2
3. Please respond to the questions below and provide your specific comments (if any). Blank boxes will be interpreted as favorable comments.

The AESO is seeking comments from Stakeholders on the development of proposed amended ISO rule Section 502.2 with regard to the following matters:

	Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
1.	Do you agree or disagree that the issue identified requires the development of proposed amended Section 502.2? Please comment.	Agree
2.	Do you agree or disagree with the potential objective or purpose of proposed amended Section 502.2? Please comment.	Agree
3.	Do you agree or disagree with the proposed form of consultation and timelines? Please comment.	Agree
4.	Do you intend to participate in any related consultation? OR Do you agree that no consultation group is required for this rule development? Please comment.	Participate
5.	Do you have any additional comments?	ATCO thanks AESO for allowing us to participate in the consultation

Stakeholder Comment Matrix – July 9, 2019

Development of Proposed Amended Section 502.2 of the ISO rules, Bulk Transmission Line Technical Requirements (“Section 502.2”)



<p>Period of Comment: July 9, 2019 through July 25, 2019</p> <p>Comments From: Consumers’ Coalition of Alberta</p> <p>Date: 2019/07/25</p>	<p>Contact: Jim Wachowich / Dan Levson</p> <p>Phone: (780) 429-0555 ext. 223 / (403) 615-8886</p> <p>Email: jim@wachowich.com / dan@bema.ltd</p>
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Instructions:

1. Please fill out the section above as indicated.
2. Please refer back to the Consultation Letter under the “Attachments” section to view materials related to the proposed amended Section 502.2
3. Please respond to the questions below and provide your specific comments (if any). Blank boxes will be interpreted as favourable comments.

The AESO is seeking comments from Stakeholders on the development of proposed amended ISO rule Section 502.2 with regard to the following matters:

	Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
1.	Do you agree or disagree that the issue identified requires the development of proposed amended Section 502.2? Please comment.	Yes.
2.	Do you agree or disagree with the potential objective or purpose of proposed amended Section 502.2? Please comment.	<i>The CCA agrees with the general objective.</i>
3.	Do you agree or disagree with the proposed form of consultation and timelines? Please comment.	<i>The CCA is concerned that the timeline to implement this rule change - that could potentially produce cost savings - is taking a very long time. If no bulk transmission lines designed to the current standard have been built since 2014/15 (when the TWG became active) and none will be designed and then built to the revised standard until the revised standard is in place, then the CCA is less concerned. However, if transmission lines have been (and will be) built to the current standard and this results in additional costs, then a material opportunity to save money will have been lost due to the length of time this rule change is taking.</i>

4.	<p>Do you intend to participate in any related consultation? OR Do you agree that no consultation group is required for this rule development? Please comment.</p>	<p><i>Yes, the CCA intends to participate in any related consultation. However, the CCA is concerned that such participation could delay implementation of any rule change, to the detriment of ratepayers due to the lost opportunity (see comments in 3 above). If the CCA is the only party wishing to participate in the consultation (other than the parties already involved in the rule development), the CCA recommends an accelerated consultation process could be achieved by addressing any remaining issues with the CCA. It appears that this rule change has been underway for over 5 years and the risk of the lost opportunity increases with the passage of time.</i></p>
5.	<p>Do you have any additional comments?</p>	<p><i>The CCA remains concerned that some of the major concerns raised on the cost of transmission lines, including the excessive robustness of the RC22 towers and other issues, have not been adequately addressed.</i></p> <p><i>The CCA has raised before the issue of the AESO conducting Stakeholder Engagement processes with very short timeframes and in times when most people may be away. This includes July and August of a year, or around the Christmas – New Year’s timeframe. This happened for the original ISO 502.2 consultation.</i></p> <p><i>The CCA recommends that the AESO provide longer time periods for review of consultation periods, avoid known vacation periods if possible and that the AESO directly contact parties who they know have a significant interest in a particular matter. The CCA’s concerns with ISO 502.2, either directly in regulatory proceedings or through the CCA’s participation in the TFCMC, are well known. This narrow consultation period in the middle of the summer vacation period is particularly frustrating when the last meeting of the TWG was a year ago (July 24, 2018) according to the documents posted on the AESO’s website. This approach to consultation gives the impression that the AESO is not genuinely interested in obtaining stakeholder input (other than from TFOs and the UCA).</i></p>