

<p>Period of Comment: December 2, 2020 through January 8, 2021</p> <p>Comments From: ATCO Electric</p> <p>Date [yyyy/mm/dd]: 2021/01/06</p>	<p>Contact: Kenh Tran</p> <p>Phone: 780 910 5959</p> <p>Email: Kenh.tran@atco.com</p>
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Instructions:

1. Please fill out the section above as indicated.
2. Please refer back to the *Letter of Notice of a Proposed Final Draft ISO Rule* under the “Attachments” section to view the materials regarding proposed final draft of Section 502.10 of the ISO rules, *Revenue Metering System Technical and Operating Requirements* (“Section 502.10”).
3. Please respond to the questions below and provide your specific comments, proposed revisions, and reasons for your position underneath (if any). Blank boxes will be interpreted as favourable comments.
4. Please be advised that general comments do not give the AESO any specific issue to consider and address, and results in a general response.

Item #		Stakeholder comments
1	Whether you understand and agree with the objective or purpose of the proposed final draft of Section 502.10 and whether, in your view, the proposed final draft of Section 502.10 meets the objective or purpose, and if not, why.	No comment
2	Whether you agree that the proposed final draft of Section 502.10 is not technically deficient, and if not, why.	<ol style="list-style-type: none"> 1. “apparent power “ should be removed from 4(2)(b). The metered data for the measurement point definition record are published to the market place in the daily system measurement transaction (DSM). Only MWh and MVARh are required in DSM. Also, section 5 for the revenue meter does not specify the requirement for apparent power. 4(2)(b) allows for the proper measurement of metered energy, metered demand, and metered apparent power in accordance with ISO rules and the ISO tariff, as applicable; and 2. “revenue meter” in 6(1)(b) should be replaced with “measurement transformer”.

Item #		Stakeholder comments
		<p>6(1)(b) the revenue meter measurement transformer is not the subject of a dispensation under the <i>Electricity and Gas Inspection Act</i>, RSC 1985 c E-4, as amended.</p> <p>3. The AESO removed the reference to AUC Rule 21 and kept the 8 years in the “Section-502.10-Draft-2020-12-02.pdf”. ATCO suggests reverting to the original wording but removing the 8 year requirement. If the period is changed in Rule 21, this section of the ISO rule does not need to change.</p> <p>7(1) The legal owner of a revenue meter must retain metering data from the revenue metering system, including a record of final estimates and adjustments, and the method used to perform the estimates or adjustments for a period of at least 8 years.</p> <p>4. Replace reference 4(3) with 4(2) in 7(2).</p> <p>7(2) The legal owner of a revenue meter must process metering data for each measurement point in accordance with the algorithm in the measurement point definition record issued in accordance with subsection 4(32).</p> <p>5. ATCO suggests replacing “validation” with “in-situ test” for consistency and avoiding confusion.</p> <p>7(4) The legal owner must maintain validation in-situ test records until the next in-situ testing date set out in subsection 8(1).</p>
3	Whether you agree with that the proposed final draft of Section 502.10, taken together with all ISO rules, supports a fair, efficient and openly competitive market, and if not, why.	No comment
4	Whether you agree that the proposed final draft of Section 502.10 supports the public interest, and if not, why.	No comment
5	Any additional comments regarding the proposed final draft of Section 502.10.	No comment

Please provide any additional comments or views on the type of content that should be included in an information document associated with the proposed final draft of Section 502.10

No comment