

# Stakeholder Comment Matrix

## Proposed Applicability of New Section 502.10, *Revenue Metering Technical Requirements*



<p><b>Period of Comment:</b> May 21, 2020 through June 26, 2020</p> <p><b>Comments From:</b> AltaLink Management Ltd. (AML)</p> <p><b>Date:</b> 2020/06/26</p>	<p><b>Contact:</b> Jenette Yearsley</p> <p><b>Phone:</b> 403-387-8275</p> <p><b>Email:</b> Jenette.Yearsley@AltaLink.ca</p>
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The AESO is seeking comments from Stakeholders regarding the applicability for the requirements contained in proposed New Section 502.10 of the ISO rules, *Revenue Metering Technical Requirements* (“Section 502.10”).

Question	Stakeholder Comments
<p>Please indicate, from the perspective of your business:</p> <ul style="list-style-type: none"> <li>(i) the party responsible for performing the work detailed in each requirement below; and</li> <li>(ii) the party that should be ultimately responsible for meeting the requirements below.</li> </ul> <p>Further, in subsection 4(3) below, please note the AESO’s additional request to provide information regarding the party to which the AESO should issue the measurement point definition record.</p>	
<p><b>Measurement Point Definition Record</b></p> <p><b>4(1)</b> The <b>legal owner</b> of a <b>revenue meter</b> must, where such <b>legal owner</b> requires a new <b>measurement point definition record</b> or an amendment to an existing <b>measurement point definition record</b>, apply to the <b>ISO</b> no later than <b>30 days</b> prior to the first <b>day</b> of the month in which the <b>legal owner</b> of the <b>revenue meter</b> proposes to energize the new or altered <b>revenue metering system</b> for the first time.</p>	<p>AltaLink believes there are two different situations that result in different answers to (i) and (ii).</p> <p>In the situation where a party is the legal owner of the revenue meter (legal owner) and the Metering Data Provided (MDP), AltaLink agrees that the legal owner would be the party responsible for performing the work detailed in 4(1) and the party ultimately responsible for meeting the requirement of 4(1).</p> <p>In the situation where a party is the legal owner but IS NOT the MDP, then AltaLink submits that the legal owner would be the party responsible for performing the work detailed in 4(1) but the party ultimately responsible for meeting the requirement of 4(1) would be the MDP.</p> <p>AltaLink wishes to clarify that the MDP is issued the MPDR by the Alberta Electric System Operator (AESO) and as a result of the legal owner may not have a copy of</p>

Question	Stakeholder Comments
	the measurement point definition record (MPDR).
<p><b>(2) The legal owner of a revenue meter must submit to the ISO the information prescribed by the ISO when applying for a new or amended measurement point definition record in accordance within subsection 4(1).</b></p>	<p>AltaLink believes there are two different situations that result in different answers to (i) and (ii).</p> <p>In the situation where a party is the legal owner and the Metering Data Provided (MDP), AltaLink agrees that the legal owner would be the party responsible for performing the work detailed in 4(2) and the party ultimately responsible for meeting the requirement of 4(2).</p> <p>In the situation where a party is the legal owner but IS NOT the MDP, then AltaLink submits that the legal owner would be the party responsible for performing the work detailed in 4(2) but the party ultimately responsible for meeting the requirement of 4(2) would be the MDP.</p> <p>AltaLink wishes to clarify that the MDP is issued the MPDR by the Alberta Electric System Operator (AESO) and as a result of the legal owner may not have a copy of the MPDR.</p>
<p>Please provide information regarding the party to which the AESO should issue the measurement point definition record.</p> <p><b>(3) The ISO must issue a measurement point definition record for a measurement point to the legal owner of the revenue meter, or to a person designated by the legal owner of the revenue meter, if the information submitted in accordance with subsection 4(2): ...</b></p>	<p>AltaLink submits that the AESO should issue the MPDR to the MDP. As a result, in certain situations the legal owner may not be the party to which the AESO issues the MPDR.</p>
<p><b>(4) The legal owner of a revenue meter must install and operate a revenue meter in accordance with measurement point definition record issued by the ISO in accordance with subsection 4(3)</b></p>	<p>AltaLink submits that the legal owner is responsible for performing the work and meeting the requirement described in 4(4). The legal owner will received the MPDR and/or direction from the MDP in order to meet this requirement.</p>
<p><b>Revenue Meter</b></p>	

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<p><b>5(1)</b> The <b>legal owner</b> of a <b>revenue meter</b> must ensure that the <b>revenue meter</b> is approved, verified, sealed, re-verified and sealed, as applicable, in accordance with the <i>Electricity and Gas Inspections Act</i>, RSC 1985 c E-4, as amended.</p>	<p>AltaLink submits that the legal owner is responsible for performing the work and meeting the requirement described in 5(1)</p>
<p><b>(2)</b> The <b>legal owner</b> of a <b>revenue meter</b> must ensure that the <b>revenue meter</b> has an accuracy class rating that is less than or equal to 0.2% for Watthour measurement if:</p> <ul style="list-style-type: none"> <li>(a) the capacity of the <b>metering point</b> of the <b>revenue meter</b> is greater than or equal to 1.0 MVA; and</li> <li>(b) the <b>revenue meter</b> is not the subject of a dispensation under the <i>Electricity and Gas Inspection Act</i>, RSC 1985 c E-4, as amended.</li> </ul>	<p>AltaLink submits that the legal owner of the revenue meter is responsible for performing the work and meeting the requirement described in 5(2)</p>
<p><b>(3)</b> The <b>legal owner</b> of a <b>revenue meter</b> must ensure that the <b>revenue meter</b> has an accuracy class rating that is less than or equal to 0.5% for Varhour measurement if:</p> <ul style="list-style-type: none"> <li>(a) the capacity of the <b>metering point</b> of the <b>revenue meter</b> is greater than or equal to 1.0 MVA; and</li> <li>(b) the <b>revenue meter</b> is not the subject of a dispensation under the <i>Electricity and Gas Inspection Act</i>, RSC 1985 c E-4, as amended.</li> </ul>	<p>AltaLink submits that the legal owner of the revenue meter is responsible for performing the work and meeting the requirement described in 5(3).</p>
<p><b>Measurement Transformer</b></p>	
<p><b>6(1)</b> The <b>legal owner</b> of a <b>revenue meter</b> must ensure that the <b>measurement transformer</b> has an accuracy class rating less than or equal to 0.3% if:</p> <ul style="list-style-type: none"> <li>(a) the <b>capacity</b> of the <b>metering point</b> of the <b>revenue meter</b> is greater than or equal to 1.0 MVA; and</li> <li>(b) the <b>revenue meter</b> is not the subject of a dispensation under the <i>Electricity and Gas Inspection Act</i>, RSC 1985 c E-4, as amended.</li> </ul>	<p>AltaLink submits that the legal owner of the revenue meter is responsible for performing the work and meeting the requirement described in 6(1).</p>

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<p><b>(2)</b> The <b>legal owner</b> of a <b>revenue meter</b> must, unless the <b>ISO</b> approves otherwise, ensure that the measurement transformer:</p> <ul style="list-style-type: none"> <li>(a) is located and connected without compensation methods;</li> <li>(b) produces a real <b>metering point</b>; and</li> <li>(c) has a dedicated current transformer core for measurement.</li> </ul>	<p>AltaLink submits that the legal owner of the revenue meter is responsible for performing the work and meeting the requirement described in 6(2).</p>
<p><b>Metering Data Services</b></p>	
<p><b>7(1)</b> The <b>legal owner</b> of a <b>revenue meter</b> must retain metering data from the <b>revenue metering system</b>, including a record of final estimates and adjustments and the method used to perform the estimates or adjustments, in the electronic format specified in the <b>Commission’s Rule 021: Settlement System Code Rules</b> for a period of at least 8 years.</p>	<p>AltaLink submits that the party responsible for the work and meeting the requirement in 7(1) is the MDP. The legal owner may not be in possession of the metering data as they are not responsible for it and thus cannot be responsible for the work nor meeting the requirement.</p>
<p><b>(2)</b> The <b>legal owner</b> of a <b>revenue meter</b> must process metering data for each <b>measurement point</b> in accordance with the algorithm in the <b>measurement point definition record</b> issued in accordance with subsection 4(3).</p>	<p>AltaLink submits that the party responsible for the work and meeting the requirement in 7(2) is the MDP. The legal owner may not be in possession of the metering data as they are not responsible for it and thus cannot be responsible for the work nor meeting the requirement.</p>
<p><b>(3)</b> The <b>legal owner</b> of a <b>revenue meter</b> must, within <b>30 days</b> of energizing the <b>revenue meter</b> for the first time, validate the metering equipment and the metering data using reasonable methods and alternative data sources.</p>	<p>AltaLink submits that the party responsible for validating the metering equipment in 7(3) is the legal owner and the party responsible for validating the metering data in 7(3) is the MDP. The legal owner may not be in possession of the metering data as they are not responsible for it and thus cannot be responsible for the work associated with metering data.</p>
<p><b>Revenue Meter Testing and Reporting</b></p>	
<p><b>8(2)</b> The <b>legal owner</b> of a <b>revenue meter</b> must provide the results of the in-situ test performed in subsection 8(1) to <b>ISO</b> if the test resulted in an error measurement of +/- 3%.</p>	<p>AltaLink submits that the legal owner is responsible for performing the work and meeting the requirement described in 8(2).</p>

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<p><b>(3)</b> The <b>legal owner</b> of a <b>revenue meter</b> must, at the request of the <b>ISO</b>:</p> <ul style="list-style-type: none"> <li>(a) undertake and complete in-situ tests for the <b>metering equipment</b> within a mutually agreed time frame; and</li> <li>(b) report the results to the <b>ISO</b> within 30 <b>days</b> of receiving the <b>ISO's</b> request.</li> </ul>	<p>AltaLink submits that the legal owner of the revenue meter is responsible for performing the work and meeting the requirement described in 8(3).</p>
<p><b>Measurement Data Corrections</b></p>	
<p><b>9(1)</b> The <b>legal owner</b> of a <b>revenue meter</b> must, if the <b>legal owner</b> discovers an error in <b>measurement data</b> that has been submitted to the <b>ISO</b> for financial settlement, notify the <b>ISO</b> of the error as soon as practicable in the form the <b>ISO</b> specifies.</p>	<p>AltaLink submits that the party responsible for the work and meeting the requirement in 9(1) is the MDP. The legal owner may not be in possession of the metering data as they are not responsible for it and thus cannot be responsible for the work nor meeting the requirement.</p>
<p><b>(2)</b> The <b>legal owner</b> of a <b>revenue meter</b> must include the following information in the notice referred to in subsection 9(1):</p> <ul style="list-style-type: none"> <li>(a) the reason for the error; and</li> <li>(b) the correct measurement data.</li> </ul>	<p>AltaLink submits that the party responsible for the work and meeting the requirement in 9(2) is the MDP. The legal owner may not be in possession of the metering data as they are not responsible for it and thus cannot be responsible for the work nor meeting the requirement.</p>
<p><b>(4)</b> The <b>legal owner</b> of a <b>revenue meter</b> must submit the correct measurement data to the <b>ISO</b> as soon as practicable if the <b>ISO's</b> review in subsection 9(3) confirms that the previously submitted measurement data was erroneous.</p>	<p>AltaLink submits that the party responsible for the work and meeting the requirement in 9(4) is the MDP. The legal owner may not be in possession of the metering data as they are not responsible for it and thus cannot be responsible for the work nor meeting the requirement.</p>
<p><b>Restoration</b></p>	
<p><b>10(1)</b> The <b>legal owner</b> of a <b>revenue meter</b> must, upon becoming aware of a failure of the <b>revenue metering system</b> that may result in a restatement of measurement data that has been submitted to the <b>ISO</b>, notify the <b>ISO</b> in writing of the failure.</p>	<p>AltaLink submits that the party responsible for the work and meeting the requirement in 10(1) is the MDP. The legal owner may not be in possession of the metering data as they are not responsible for it and thus cannot be responsible for the work nor meeting the requirement.</p>
<p><b>(2)</b> The <b>legal owner</b> of a <b>revenue meter</b> must, within 30 <b>days</b> of providing the notification under subsection 10(1):</p> <ul style="list-style-type: none"> <li>(a) investigate and determine the nature and extent of the</li> </ul>	<p>AltaLink submits that the party responsible for the work and meeting the requirement in 10(2) is the legal owner.</p>

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<p>failure;</p> <p>(b) provide the <b>ISO</b> with written notification detailing the nature and extent of the failure; and</p> <p>(c) submit to the <b>ISO</b> a plan to restore the <b>revenue metering system</b>.</p>	
<p><b>(3)</b> The <b>ISO</b> must:</p> <p>(a) [...] ; or</p> <p>(b) direct the <b>legal owner</b> of the <b>revenue meter</b> to amend the restoration plan in a manner that will resolve the failure within a reasonable amount of time.</p>	<p>AltaLink submits that the party responsible for the work and meeting the requirement in 10(3) is the ISO.</p>
<p><b>(4)</b> The <b>legal owner</b> of a <b>revenue meter</b> must amend the restoration plan in accordance with the <b>ISO</b>'s direction provided in subsection 10(3)(b).</p>	<p>AltaLink submits that the party responsible for the work and meeting the requirement in 10(4) is the legal owner.</p>
<p><b>(5)</b> The <b>legal owner</b> of a <b>revenue meter</b> must restore the <b>revenue metering system</b> in accordance with:</p> <p>(a) the restoration plan approved by the <b>ISO</b> pursuant to subsection 10(3)(a); or</p> <p>(b) the restoration plan amended in accordance with subsection 10(4).</p>	<p>AltaLink submits that the party responsible for the work and meeting the requirement in 10(5) is the legal owner.</p>