

APPENDIX C AESO PIP

1. Introduction

The AESO's Participant Involvement Program (PIP) is designed to notify the parties notified in the transmission facility owner's (TFO's) PIP and any other parties that the AESO determines may have an interest in the needs identification document, including, but not limited to:

- i. occupants, landowners or residents;
- ii. local authorities, agencies and government which have responsibilities related to electric transmission line development;
- iii. First Nations and Métis; and
- iv. market participants

(collectively, Stakeholders).

The AESO's PIP has been conducted in accordance with the requirements of Section 6.2.1, NID19 and Appendix A2 of the current Alberta Utilities Commission (Commission) Rule 007 (AUC Rule 007), effective April 2, 2018.

From May 2018 to June 2019, the AESO conducted a PIP to assist in preparing its *Claresholm Solar Project Connection Needs Identification Document* (NID). The AESO directed the TFO, in this case AltaLink Management Ltd., in its capacity as general partner of AltaLink, L.P., to assist the AESO in providing notification as part of the AESO's PIP.

2. Stakeholder Notification

The AESO developed a one-page AESO Need Overview document with the purpose of notifying Stakeholders of the following items:

- a description of the need for development;
- a description of the AESO's preferred option to respond to the system access service request;
- identification of the general area where facilities could be installed to implement the AESO's preferred option to respond to the system access service request;
- the AESO's contact information, including telephone, email and website, for further information; and
- the AESO's next steps, including the AESO's intention to apply to the Commission for approval of the need.

A copy of the Need Overview was posted to the AESO website at <https://www.aeso.ca/grid/projects/claresholm-solar-project-connection/> and a notice was published in the AESO Stakeholder Newsletter on May 31, 2018. Copies of the Need Overview posting and the AESO Stakeholder Newsletter notice have been included as Attachments 1 and 2, respectively. The Need Overview was also included with the TFO's project-specific information package that was distributed to Stakeholders, as further described in Section 2.1.

2.1 Stakeholders Notified in the TFO's PIP

The TFO has advised the AESO that its PIP included notification within 800 metres of the proposed transmission line right-of-way and within 100 metres of the proposed fibre optic cable installation, as recommended by the Commission in Appendix A1 of AUC Rule 007.¹

The TFO notified a total of approximately 36 Stakeholders, of which 21 were classified as private or individual landowners. The other 15 notified Stakeholders and the TFO's rationale for their inclusion in the PIP are listed in Table 1.

Table 1: Summary of Notified Agency and Industry Stakeholders

Stakeholder	TFO's Rationale for Inclusion in the PIP
Alberta Culture and Tourism	Provincial requirements
Alberta Environment and Parks – Medicine Hat Office	Provincial requirements
Alberta Environment and Parks – Cochrane Office	Provincial requirements
Alberta Transportation	Provincial requirements
Canadian Natural Resources Limited	Pipeline Owner in the project notification area
Claresholm Solar Inc.	Encumbrance holder in the project notification area
Crescent Point Energy Corp.	Pipeline Owner in the project notification area
FortisAlberta Inc.	Distribution Facility Owner in the project notification area
Lexin Resources Ltd.	Well Facility Owner in the project notification area
Municipal District of Willow Creek	Municipal requirements
NAV CANADA	Air Navigation System requirements
Telus Communications Company	Telecommunications Facility Owner in the project notification area
Town of Fort Macleod	Municipal requirements
Twin Valley Regional Water Services Commission	Waterline Asset Facility Owner in the project notification area
Vulcan County	Municipal requirements

Attachment 3 includes the TFO's project newsletter, which was included with the AESO Need Overview in the TFO project-specific information package that was distributed to the Stakeholders described above between May 18, 2018 and August 17, 2018. The TFO's project newsletter and the AESO Need Overview were also posted on the TFO's project-specific webpage at <http://www.altalink.ca/projects/view/300/claresholm-solar-connection> on May 18, 2018. The TFO's project newsletter included the AESO's contact information, a description of the AESO's role, a reference to the AESO Need Overview, and an invitation to contact the TFO or the AESO for additional information.

¹ AltaLink has identified its facility application to be of the type: *Overhead transmission line and new substation development – rural or industrial setting*, as categorized in AUC Rule 007, Appendix A1, Section 5.

3. Stakeholders Notified by the AESO

The AESO also notified 7 market participants that the AESO determined may have an interest in the NID. The AESO identified that, under certain potential system conditions, these market participants may be affected following the connection of Claresholm Solar Project Connection. A Market Participant Notification Letter, which included the Need Overview, was sent to the notified market participants on May 15, 2019.

The seven notified market participants are as follows:

- BowArk Energy Ltd.
- Campus Energy Partners LP
- ENMAX Energy Corporation
- Irrigation Canal Power Co-op Ltd.
- Signalta Resources Limited
- Stirling Wind Project Ltd.
- Suncor Energy Inc.

A generic version of the Market Participant Notification Letter was posted to the AESO website on May 15, 2019 at <https://www.aeso.ca/grid/projects/claresholm-solar-project-connection/> A copy has been included as Attachment 4.

4. Filing Notification

Most recently, the AESO notified Stakeholders of its intention to submit the NID to the Commission by posting a Notification of NID Filing to the AESO website at <https://www.aeso.ca/grid/projects/claresholm-solar-project-connection/> and a publishing notice in the AESO Stakeholder Newsletter on June 11, 2019. Copies of the Notification of NID Filing posting and the AESO Stakeholder Newsletter notice have been included as Attachments 5 and 6, respectively.

5. Responding to Questions and Concerns

To ensure that Stakeholders had the opportunity to provide feedback, the AESO provided Stakeholders with AESO contact information, including a dedicated, toll-free telephone line (1-888-866-2959) and a dedicated email address (stakeholder.relations@aeso.ca). The AESO Need Overview included this contact information, along with the AESO's mailing address (2500, 330 5th Ave. SW, Calgary) and website address (www.aeso.ca), and a privacy statement that described how the AESO is committed to protecting Stakeholders' privacy.

As directed by the AESO, the TFO was prepared to direct any Stakeholder questions addressed to the AESO, or questions regarding the AESO Need Overview, to the AESO.

6. Concerns and Objections Raised

One Stakeholder that received the AESO's Market Participant Notification Letter raised questions and concerns related to how its operations may be affected following the connection of the Claresholm Solar

Project Connection. The AESO responded to the Stakeholder by providing information about the following:

- the timing of the AESO's forthcoming NID application;
- how to participate in the AUC proceeding;
- how the Stakeholder's operations might be affected following the connection of the Claresholm Solar Project Connection;
- how the Remedial Action Schemes (RAS's) and the *Real Time Transmission Constraint Management* (TCM) Rule apply to the Stakeholder's operations;
- the AESO's approach to long-term planning of the Alberta interconnected electric system (AIES);
- the AESO's approach to planning for connection projects; and
- the rationale for the AESO's market participant notification letter.

The Stakeholder did not have any additional questions that the AESO could address prior to filing. However, the AESO did commit to following up with the Stakeholder after the NID application is filed to discuss any further questions the Stakeholder may have.

The TFO has advised the AESO that none of the Stakeholders notified by the TFO identified any concerns or objections regarding the AESO's preferred option to respond to the system access service request or the need for development.

Apart from the inquiry above from the one Stakeholder, the AESO has not received any indication of concerns or objections about the AESO's preferred option to respond to the system access service request or the need for development.

7. List of Attachments

- Attachment 1 – AESO Need Overview (May 2018)
- Attachment 2 – AESO Stakeholder Newsletter Need Overview Notice (May 31, 2018)
- Attachment 3 – TFO's Project Newsletter – *Claresholm Solar Connection* (May 2018)
- Attachment 4 – AESO Market Participant Notification Letter (May 15, 2019)
- Attachment 5 – AESO Public Notification of NID Filing Website Posting (June 2019)
- Attachment 6 – AESO Stakeholder Newsletter NID Filing Notice (June 11, 2019)

Attachment 1 – AESO Need Overview (May 2018)

Need for the Claresholm Solar Connection Project in the Claresholm area

Claresholm Solar Inc. (Claresholm Solar) has applied to the Alberta Electric System Operator (AESO) for transmission system access to connect its proposed Claresholm Solar Project (Facility) in the Claresholm area. Claresholm Solar's request can be met by the following solution:

PROPOSED SOLUTION

- Add a 138 kV transmission line to connect the Facility to the existing 138 kV transmission line 180L.
- Add or modify associated equipment as required for the above transmission developments.

NEXT STEPS

- The AESO intends to apply to the Alberta Utilities Commission (AUC) for approval of the need in late 2018.
- The AESO's needs identification document (NID) application will be available on the AESO's website at www.aeso.ca/grid/projects at the time of its application to the AUC.

The following organizations have key roles and responsibilities in providing access to the transmission system:

THE AESO

- Must plan the transmission system and enable access to it for generators and other qualified customers.
- Is regulated by the AUC and must apply to the AUC for approval of its NID.

ALTALINK

- Is the transmission facility owner in Claresholm area.
- Is responsible for detailed siting and routing, constructing, operating and maintaining the transmission facilities.
- Is regulated by the AUC and must apply to the AUC for approval of its transmission facilities applications.

WHO IS THE AESO?

The Alberta Electric System Operator (AESO) plans and operates Alberta's electricity grid and wholesale electricity market safely, reliably and in the public interest of all Albertans. We are a not-for-profit organization with no financial interest or investment of any kind in the power industry.

We appreciate your views, both on the need for transmission system development and proposed transmission plans. If you have any questions or comments, please contact us directly.

CONTACT US

Alberta Electric System Operator

AESO Stakeholder Relations
stakeholder.relations@aes0.ca
1-888-866-2959

2500, 330-5th Avenue SW
Calgary, AB T2P 0L4
Phone: 403-539-2450

www.aeso.ca | [@theaes0](https://twitter.com/theaes0)

Attachment 2 – AESO Stakeholder Newsletter Need Overview Notice (May 31, 2018)

May 31, 2018

AESO Stakeholder Newsletter

GRID

Claresholm Solar Project Connection – Need for Transmission Development in the Claresholm Area

Claresholm Solar Inc. (Claresholm Solar) has applied to the AESO for transmission system access to connect its proposed Claresholm Solar Project (Facility) in the Claresholm area. Claresholm Solar's request can be met by the following solution:

- Add a 138 kV transmission line to connect the Facility to the existing 138 kV transmission line 180L
- Add or modify associated equipment as required for the above transmission developments

The AESO has posted a Need Overview for this project on its website. Please [click here](#) to view the document or visit the AESO website at www.aeso.ca and follow the path Grid > Project > Claresholm Solar Project

Attachment 3 – TFO’s Project Newsletter– Claresholm Solar Connection Project (May 2018)



May 2018

Electric system improvements near you

Claresholm Solar Connection

AltaLink's transmission system efficiently delivers electricity to 85 per cent of Albertans. Dedicated to meeting the growing need for electricity, AltaLink connects Albertans to renewable, reliable and low-cost power. With a commitment to community and environment, AltaLink is ensuring the transmission system will support Albertans' quality of life for years to come. Learn more at www.altalink.ca.

You are receiving this newsletter because you are near the Claresholm Solar Connection project and we want your input.

Claresholm Solar Inc. (Claresholm Solar) has requested a connection to the **transmission** system for their proposed Granum Substation.

We are proposing to connect Claresholm Solar's Granum Substation to the transmission system by connecting it to an existing AltaLink transmission line in the area. The proposed project is located approximately 14 kilometres east of the town of Claresholm and will be operated and maintained by AltaLink.

We are providing you with:

- project details
- a map of the proposed project site
- information about how you can provide your input
- the project schedule

If you have questions about the proposed Granum Substation, please see Claresholm Solar's contact information at the back of this newsletter.

DEFINITION:

Transmission

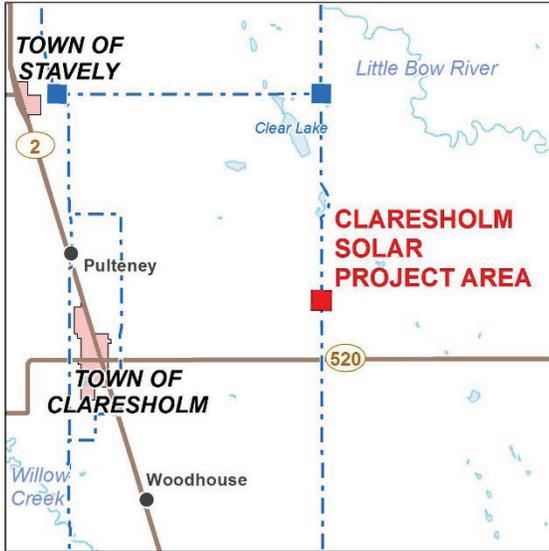
Transmission lines make up Alberta's electric highway, linking the places where power is generated to your community where power is used. Transmission lines transport large amounts of power from power plants across the province. The transmission system connects diverse sources of power generation including wind, solar, natural gas and more.

CONTACT US

1-877-267-1453

stakeholderrelations@altalink.ca

www.altalink.ca/projects



LEGEND

	Claresholm Solar Project Area		Road
	Existing Substation		Urban Area
	Existing Transmission Line		Water Body
	Hamlet or Locality		

Project details

AltaLink’s proposed project involves constructing approximately 30 metres of new 138 kilovolt (kV) transmission line to connect Clareholm Solar’s proposed Granum Substation to the transmission system. This new transmission line will be called 180AL and will connect to AltaLink’s existing 180L transmission line.

The new transmission line will:

- consist of three wood or steel H-frame structures approximately 14 to 25 metres tall
- be single circuit
- have a right-of-way width of approximately 20 metres on private land

Two of the proposed H-frame structures will require airbreak equipment, which isolates portions of a transmission line so that future maintenance can be performed without the need for outages.

Communications equipment upgrades are also required as part of this project to ensure the safe and reliable operation of the transmission system. AltaLink is proposing to install underground fibre optic cable in the proposed transmission line right-of-way, as well as near the Vulcan and Fort Macleod substations.

We are also proposing to install approximately 10 kilometres of fibre optic cable above ground on the existing 161L/180L transmission line.

Please see the attached map for an overview of the project area, including the location of the proposed transmission line, fibre optic cable and associated rights-of-way.



The existing 161L/180L transmission line near the proposed project area.



A steel H-frame structure with airbreak similar to those proposed for the project.

Electric and Magnetic Fields (EMF)

AltaLink recognizes that people have concerns about exposure to Electric and Magnetic Fields (EMF) and we take those concerns seriously. Everyone in our society is exposed to EMF from many sources, including:

- power lines and other electrical facilities
- electrical appliances in your home
- building wiring

National and international organizations such as Health Canada and the World Health Organization have been conducting and reviewing research about EMF for more than 40 years. Based on this research, these organizations have not recommended the general public take steps to limit their everyday exposure to EMF from electrical facilities. If you have any questions about EMF, please contact us.

Website: www.altalink.ca/emf

Email: emfdialogue@altalink.ca

Toll-free phone number: 1-866-451-7817

Providing your input

We will contact landowners, residents and occupants near the proposed project to gather input and address questions or concerns. After the consultation process is complete we will file an application with the Alberta Utilities Commission (AUC). The AUC will review the application through a process in which stakeholders can participate.

We will notify stakeholders when we file the application and again once the AUC has reached a decision about the project. To learn more about the AUC process and how you can become involved, please refer to the brochure included in this package titled *Public involvement in a proposed utility development*.

Anticipated project schedule

Notify and consult with stakeholders	May to July 2018
File application with Alberta Utilities Commission (AUC)	September 2018
Start construction if project is approved	March 2020
Construction completed	June 2020

Although we attempt to follow the anticipated project schedule it is subject to change. We will continue to provide you with updated schedule information if required as the project progresses.

Contact us

To learn more about the proposed project, please contact:

ALTALINK

1-877-267-1453 (toll-free)

Email: stakeholderrelations@altalink.ca

Website: www.altalink.ca/projects

To learn more about Claresholm Solar's proposed project, please contact:

CLARESHOLM SOLAR INC.

Philipp Andres

1-519-385-0501

Email: pandres@perimetersolar.ca

To learn more about Alberta's electric system and the need for the project, please contact:

ALBERTA ELECTRIC SYSTEM OPERATOR (AESO)

1-888-866-2959 (toll-free)

Email: stakeholder.relations@aeso.ca

Website: www.aeso.ca

The AESO is an independent, not-for-profit organization responsible for the safe, reliable and economic planning and operation of the provincial transmission grid. For more information about why this project is needed, please refer to the AESO's Need Overview included with this package, or visit www.aeso.ca. If you have any questions or concerns about the need for this project you may contact the AESO directly. You can make your questions or concerns known to an AltaLink representative who will collect your personal information for the purpose of addressing your questions and/or concerns to the AESO. This process may include disclosure of your personal information to the AESO.

To learn more about the application and review process, please contact:

ALBERTA UTILITIES COMMISSION (AUC)

780-427-4903 (toll-free by dialing 310-0000 before the number.)

Email: consumer-relations@auc.ab.ca

Website: www.auc.ab.ca

The Alberta Utilities Commission (AUC) ensures the fair and responsible delivery of Alberta's utility services. AltaLink submits applications for new transmission projects to the AUC and the AUC reviews them in a public process.

PRIVACY COMMITMENT

AltaLink is committed to protecting your privacy. AltaLink will collect, use, and disclose personal information in accordance with AltaLink's Privacy Policy and the *Personal Information Protection Act* (Alberta). As part of the regulatory process for new transmission projects, AltaLink may provide your personal information to Alberta Utilities Commission (AUC). For more information about how AltaLink protects your personal information, visit our website at www.altalink.ca/privacy or contact us directly via e-mail privacy@altalink.ca or phone at 1-877-267-6760.

INCLUDED IN THIS INFORMATION PACKAGE:

- Project map
- AESO Need Overview
- AUC brochure: *Public involvement in a proposed utility development*

SUBSCRIBE TO THIS PROJECT

- 1) Visit: altalink.ca/projects
- 2) Search for the project title
- 3) Click **Subscribe to Updates**

LET'S TALK TRANSMISSION



www.twitter.com/altalink



www.facebook.com/altalinktransmission

Attachment 4 – AESO Market Participant Notification Letter (May 15, 2019)

May 15, 2019

[Notified Market Participant]**[Notified Market Participant Address]**Dear **Notified Market Participant**:Re: **Need for the Claresholm Solar Project A and the Claresholm Solar Project B Connection in the Claresholm area**

The Alberta Electric System Operator (AESO) would like to advise you that Claresholm Solar Inc. has applied for transmission system access to connect its Claresholm Solar Project A and Claresholm Solar Project B (planned Facilities) to the Alberta interconnected electric system (AIES) in the AESO South Planning Region.

A copy of the AESO Need Overview document is attached for your information. The AESO Need Overview describes the AESO's proposed transmission development to connect the planned Facilities to the AIES,¹ and the AESO's next steps, which includes submitting a needs identification document (NID) application to the Alberta Utilities Commission (AUC) for approval.

The purpose of this letter is to advise you that the AESO has identified that, under some potential system conditions, the operation of the **[Notified Market Participant Facility]** may be affected following the connection of the planned Facilities.²

Connection Assessment Findings

An engineering connection assessment was carried out by the AESO to assess the transmission system performance following the connection of the planned Facilities. The connection assessment identified the potential for system performance issues, under some future system conditions, following the connection of the planned Facilities.

Transmission Constraint Management

To mitigate these potential system performance issues, existing and planned remedial action schemes (RASs) may be modified. In addition, new RASs may be required.

The AESO may also make use of real-time operational measures to mitigate these potential system performance issues, in accordance with Section 302.1 of the ISO rules, *Real Time Transmission Constraint Management* (TCM Rule). When applied, the TCM Rule could result in the AESO issuing directives for curtailment to source assets that are effective in managing a constraint.

¹ After the AESO issued its Need Overview document, the Claresholm Solar Project was divided into two separate solar generation facilities, the Claresholm Solar Project A and the Claresholm Solar Project B.

² The studies were performed assuming a combined Rate STS, *Supply Transmission Service*, contract capacity of 130 MW for the planned Facilities.

The connection assessment identified source assets, including the **[Notified Market Participant Facility]**, which are effective in mitigating the potential transmission constraints.

Renewable Generation Integration

The actual impacts of the connection of the planned Facilities will depend on the actual energization timing, as well as the energization timing of other planned renewable generation connection projects in the area. The AESO will ensure plans are in place when impacts of the planned Facilities, and the other planned renewable generation connection projects in the area become certain. As mentioned in the AESO's *2019 Transmission Capability Assessment for Renewables Integration* report,³ renewable integration capability could be achieved through use of RASs, which is consistent with the findings of the engineering connection assessment.

Transmission Regulation Section 15(2) Application

If the AESO anticipates that congestion under system normal (Category A) conditions will arise on the transmission system, then the AESO is required to file and obtain approval from the AUC for an "exception" under Section 15(2) of the *Transmission Regulation*. The AESO will notify market participants if and when the AESO determines it is necessary to apply to the AUC for approval of such an exception, and will address the frequency, magnitude and duration of any anticipated congestion at that time.

For Further Information

The engineering connection assessment will be included in the AESO's Claresholm Solar Project A and Claresholm Solar Project B Connection NID application. Following submission of the NID application to the AUC, the NID application will be posted on the AESO website at: <https://www.aeso.ca/grid/projects/>

If you have any questions or concerns, please contact the AESO at 1-888-866-2959 or stakeholder.relations@aeso.ca

Yours truly,

"Electronically signed by"

Maz Mazadi, PhD, P.Eng., SMIEEE
 Manager, Project and System Access Studies

Attachments:
 AESO Need Overview: *Need for the Claresholm Solar Connection Project in the Claresholm area*

³ Available on the AESO website at: <https://www.aeso.ca/grid/long-term-transmission-plan/>

Need for the Claresholm Solar Connection Project in the Claresholm area

Claresholm Solar Inc. (Claresholm Solar) has applied to the Alberta Electric System Operator (AESO) for transmission system access to connect its proposed Claresholm Solar Project (Facility) in the Claresholm area. Claresholm Solar's request can be met by the following solution:

PROPOSED SOLUTION

- Add a 138 kV transmission line to connect the Facility to the existing 138 kV transmission line 180L.
- Add or modify associated equipment as required for the above transmission developments.

NEXT STEPS

- The AESO intends to apply to the Alberta Utilities Commission (AUC) for approval of the need in late 2018.
- The AESO's needs identification document (NID) application will be available on the AESO's website at www.aeso.ca/grid/projects at the time of its application to the AUC.

The following organizations have key roles and responsibilities in providing access to the transmission system:

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- Must plan the transmission system and enable access to it for generators and other qualified customers.
- Is regulated by the AUC and must apply to the AUC for approval of its NID.

ALTALINK

- Is the transmission facility owner in Claresholm area.
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We appreciate your views, both on the need for transmission system development and proposed transmission plans. If you have any questions or comments, please contact us directly.

CONTACT US

Alberta Electric System Operator

AESO Stakeholder Relations
stakeholder.relations@aes0.ca
1-888-866-2959

2500, 330-5th Avenue SW
Calgary, AB T2P 0L4
Phone: 403-539-2450

www.aeso.ca | [@theaes0](https://twitter.com/theaes0)

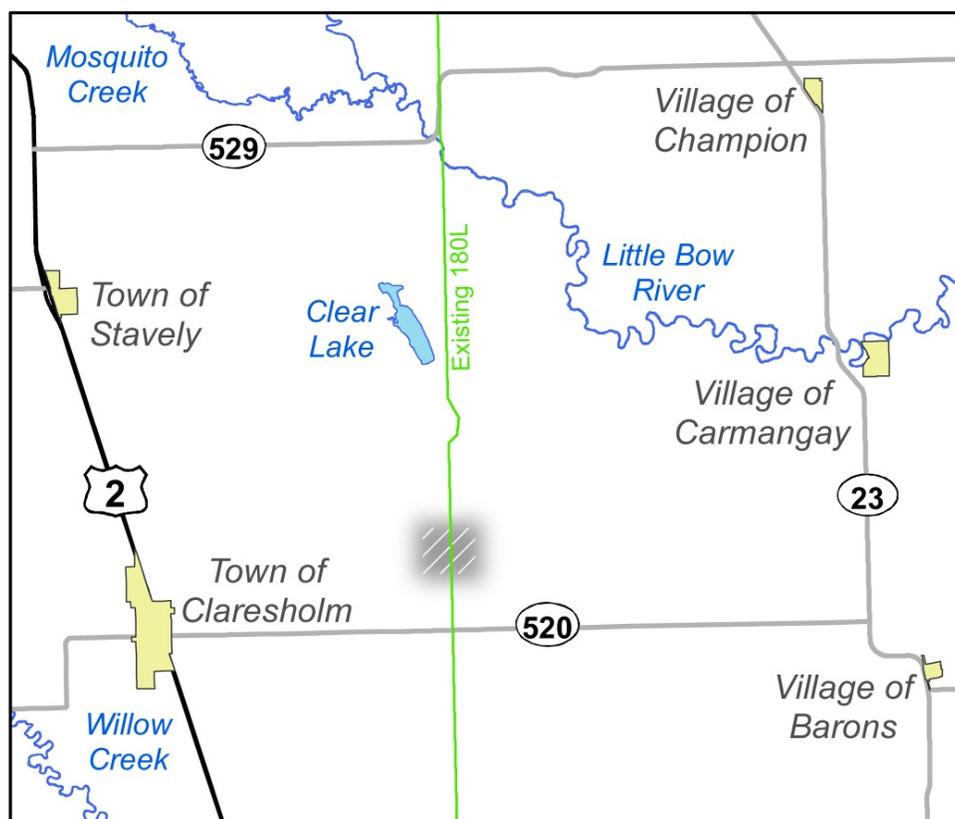
Attachment 5 – AESO Public Notification of NID Filing Website Posting (June 2019)

Notification of Needs Identification Document Filing Addressing the Need for the Claresholm Solar Project Connection in the Claresholm Area

The Alberta Electric System Operator (AESO) advises you that it intends to file a Needs Identification Document (NID) for the Claresholm Solar Project Connection with the Alberta Utilities Commission (AUC) on or after June 26, 2019.

Claresholm Solar Inc. (Claresholm Solar) has applied to the AESO for transmission system access to connect its approved Claresholm Solar Project (Facility) in the Claresholm area. Claresholm Solar's request can be met by the following solution:

- Add one 138 kilovolt (kV) transmission line to connect the Facility to the existing 138 kV transmission line 180L.
- Add or modify associated equipment as required for the above transmission developments.



The shaded area on the map indicates the approximate location of the proposed transmission developments, including the 138 kV transmission line. The specific transmission facilities may extend beyond the shaded area shown.

AltaLink Management Ltd. is the transmission facility owner (TFO) in the Claresholm area. In May 2018, the AESO and the TFO began presenting this need to stakeholders, including residents, occupants, and landowners. The AESO will apply to the AUC for approval of the need for this transmission development. Once filed with the AUC, the NID will be posted on the AESO website at <https://www.aeso.ca/grid/projects/claresholm-solar-project-connection/>

In a separate application, called a Facility Application, the TFO will provide more details about the specific facilities associated with the AESO's proposed transmission development, and will request AUC approval to construct and operate these facilities.

For more information, please visit our website, www.aeso.ca or contact us at 1-888-866-2959 or stakeholder.relations@aesoc.ca

Attachment 6 – AESO Stakeholder Newsletter NID Filing Notice (June 11, 2019)

June 11, 2019

AESO Stakeholder Newsletter

GRID

Claresholm Solar Project Connection – Notice of NID Filing

Claresholm Solar Inc. (Claresholm Solar) has applied to the AESO for transmission system access to connect its approved Claresholm Solar Project (Facility) in the Claresholm area. Claresholm Solar's request can be met by the following solution:

- Add one 138 kilovolt (kV) transmission line to connect the Facility to the existing 138 kV transmission line 180L.
- Add or modify associated equipment as required for the above transmission developments.

The AESO intends to file the Claresholm Solar Project Connection Needs Identification Document (NID) application with the Alberta Utilities Commission (AUC) on or after June 26, 2019, requesting that the AUC approve this NID.

The AESO has posted the Notification of NID filing on its website. Please [click here](#) to view the document or visit the AESO website at www.aeso.ca and follow the path: Grid > Project > Claresholm Solar Project Connection to see all the relevant documents, including the NID application once it is filed with the AUC.