

February 13, 2020

To: Market Surveillance Administrator, Market Participants, and Other Interested Parties

Re: **Letter of Notice for Development of Proposed Amended ISO Rules and AESO Consolidated Authoritative Documents Glossary (“CADG”) Terms and Definitions**

Pursuant to Section 4 of Alberta Utilities Commission Rule 017: *Procedures and Process for Development of ISO Rules and Filing of ISO Rules with the Alberta Utilities Commission*, the Alberta Electric System Operator (“AESO”) is providing notice and seeking feedback from the Market Surveillance Administrator, market participants, and other interested parties (“Stakeholders”) on the development of the proposed amended ISO rules and CADG terms and definitions listed below:

- 1) **Section 103.2, *Dispute Resolution*;**
- 2) **Section 201.1, *Pool Participant Registration*;**
- 3) **Section 201.4, *Submission Methods and Coordination*;**
- 4) **Section 203.4, *Delivery Requirements for Energy*;**
- 5) **Section 304.2, *Electric Motor Start Requirements*;**
- 6) **Section 304.8, *Event Analysis*;**
- 7) **Section 305.4, *System Security*;**
- 8) **Section 306.3, *Load Planned Outage Reporting*;**
- 9) **Section 306.4, *Transmission Outage Reporting and Coordination*;**
- 10) **Section 306.5, *Generating Outage Reporting and Coordination*;**
- 11) **Section 501.10, *Transmission Loss Factors*;**
- 12) **Section 502.9, *Synchrophasor Measurement Unit Technical Requirements*;**
- 13) **Section 507.1, *Open Access Requirements for Proposed Interties*; and**
- 14) **AESO CADG Definition – “agent”**
- 15) **AESO CADG Definition – “Alberta internal load”**
- 16) **AESO CADG Definition – “business day”**
- 17) **AESO CADG Definition – “generating asset steady state”**
- 18) **AESO CADG Term and Definition – “LTA metrics”**
- 19) **AESO CADG Term and Definition – “LTA threshold”**
- 20) **AESO CADG Term and Definition – “LTA threshold actions”**
- 21) **AESO CADG Definition – “market participant”**
- 22) **AESO CADG Definition – “point of supply”**
- 23) **AESO CADG Definition – “ramping”**
- 24) **AESO CADG Definition – “system access service”**

collectively referred to as the “Administrative Updates”.

## Issue

During an extensive review of existing ISO rules and CADG terms and definitions, the AESO determined that a number of ISO rules and CADG terms and definitions are in need of administrative amendments and would benefit from improved clarity and alignment with the AESO’s drafting principles.

Consequently, the AESO is proposing the Administrative Updates.

## Objectives/Purpose

It is the AESO's position that the proposed administrative amendments are required for the purpose of:

- a) aligning the ISO rules with the AESO's drafting principles;
- b) providing additional clarity in certain ISO rules, terms and definitions; and
- c) removing requirements and definitions that are no longer needed.

## Background

The AESO originally developed the proposed Administrative Updates in conjunction with the capacity market. Despite the cancellation of the capacity market, the AESO was of the opinion that the Administrative Updates were still important and in a [letter](#) dated December 2, 2019, the AESO provided Stakeholders notice of, and requested feedback on, its proposal to proceed with an application to the Alberta Utilities Commission ("AUC") for approval of proposed amended ISO rules and CADG terms and definitions that were entirely reflected in the proposed Administrative Updates. Stakeholder feedback expressed concerns with the AESO's proposal and highlighted the need for further consultation. In response to the Stakeholder feedback received stating that further consultation is required on these proposed amendments, the AESO is issuing this letter of notice pursuant to AUC Rule 017 with the aim of initiating a new and separate consultation process on the proposed Administrative Updates.

## Proposed Consultation and Timeline

The AESO is of the opinion that the scope of the issues identified is relatively minimal. The AESO is therefore targeting completion of Stakeholder consultation for the proposed Administrative Updates by the beginning of Q2 2020. The AESO proposes Stakeholder consultation on the development of the proposed Administrative Updates by way of a written process as follows:

- 1) February 2020 – the AESO to post drafts of the proposed Administrative Updates for written comment;
- 2) March 2020 – the AESO to provide 3 weeks for Stakeholders to submit written comments on the drafts of the proposed Administrative Updates;
- 3) April 2020 – the AESO to post all written comments from Stakeholders and to provide the AESO's written responses to Stakeholder comments; and
- 4) April 2020 – the AESO to submit an application to the AUC for approval of the proposed Administrative Updates.

## Stakeholder Comments

Stakeholders may submit:

- (i) written comments;
- (ii) a notice of intent to participate in consultation; and
- (iii) comments on the form of consultation.

The AESO has posted, on the [AESO website](#), any data, analyses, or other material that the AESO considers to be relevant to the development of the proposed Administrative Updates.

Please use the attached Stakeholder Comment Matrix when submitting comments to the AESO. Stakeholders should ensure that comments provided represent all interests within their organization.

The deadline for Stakeholders to provide comments is February 28, 2020 to [rules\\_comments@aeso.ca](mailto:rules_comments@aeso.ca). Adherence to deadlines is essential to the integrity of the comment process, and as such, the AESO may choose not to consider any Stakeholder comments received after the deadline.

The AESO will publish all Stakeholder comments, received by the deadline, on the AESO website by March 3, 2020.

If no Stakeholder comments are received by the AESO regarding the proposed Administrative Updates, the AESO will post drafts of the proposed Administrative Updates for written consultation.

### **Related Materials**

1. [Stakeholder Comment Matrix – Development of Proposed / Amended ISO Rules and AESO Consolidated Authoritative Documents Glossary Definitions, collectively referred to as the “Administrative Updates”](#)
2. [Blackline version of Section 103.2, Dispute Resolution](#)
3. [Blackline version of Section 201.1, Pool Participant Registration](#)
4. [Blackline version of Section 201.4, Submission Methods and Coordination](#)
5. [Blackline version of Section 203.4, Delivery Requirements for Energy](#)
6. [Blackline version of Section 304.2, Electric Motor Start Requirements](#)
7. [Blackline version of Section 304.8, Event Analysis](#)
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11. [Blackline version of Section 306.5, Generating Outage Reporting and Coordination](#)
12. [Blackline version of Section 501.10, Transmission Loss Factors](#)
13. [Blackline version of Section 502.9, Synchrophasor Measurement Unit Technical Requirements](#)
14. [Blackline version of Section 507.1, Open Access Requirements for Proposed Inerties](#)
15. [Blackline version of CADG Terms and Definitions - Administrative Updates](#)
16. [Update Letter for Proposed Amended ISO Rules and AESO Consolidated Authoritative Documents Glossary \(“CADG”\) Terms & Definitions](#)

Sincerely,

*Alison Desmarais*

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Legal & Regulatory Affairs  
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