

December 2, 2020

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

Re: **Letter of Notice of the Proposed Final Draft Section 502.10 of the ISO Rules, Revenue Metering System Technical and Operating Requirements**

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 proposed final draft of Section 502.10 of the ISO Rules, *Revenue Metering System Technical and Operating Requirements* (“Section 502.10”) and associated new and amended terms and definitions (“terms and definitions”) for inclusion in the AESO’s *Consolidated Authoritative Document Glossary* (“CADG”).

Issue

The current *AESO Measurement System Standard* (the “Standard”) was developed in 2004 and was last updated by the AESO on September 18, 2007; the Standard expired in February 2013. The proposed final draft of Section 502.10 is intended to replace the Standard.

The proposed final draft of Section 502.10 is applicable to:

- (a) the legal owner of a revenue meter; and
- (b) the ISO,

and sets out the minimum technical and operating requirements for revenue meters in Alberta.

Background and Objectives

An industry technical working group was established in 2016. Throughout 2017 the AESO worked with the technical workgroup to review the Standard and, identify, prioritize and discuss the issues and solutions related to the minimum technical requirements for revenue meters.

On November 29, 2018, the AESO issued a Letter of Notice and requested Stakeholder comments on the proposed development of Section 502.10 and form of consultation. On December 11, 2019, the AESO held a Stakeholder consultation session to review and discuss the initial draft of proposed new Section 502.10 and provide Stakeholders an opportunity to ask questions and give feedback. The presentation from the Stakeholder session and meeting minutes are posted on the AESO website. On May 21, 2020, the AESO posted an Update Letter requesting additional feedback from Stakeholders on a number of specific topics for proposed new Section 502.10 and the associated new and amended defined terms¹. All materials are available on the [AESO website](#).

The AESO has considered all Stakeholder feedback received on the initial draft proposed new Section 502.10 and has developed a proposed final draft of Section 502.10. Revisions captured in the proposed final draft of Section 502.10 include:

- The AESO has observed that the party responsible for performing the work associated with the various requirements depends on the circumstances of the market participant. As a result, the AESO has determined that the requirements of proposed final draft of Section 502.10 should apply to the entity that has legal ownership of the revenue meter. If the legal owner does not

¹ See the Associated Terms and Definitions section of this Letter of Notice for detailed information.

wish to perform the work to fulfill a particular requirement, it may contract with a third-party service provider;

- Subsection 4 has been amended to require the legal owner to submit a complete application form to the AESO prior to the energization of the revenue metering system. Currently, the AESO's submission processes, forms and timelines for obtaining a measurement point definition record differ based on the type of pool asset (e.g., transmission-connection, distribution generation, large micro-generation). These processes are not changing. The AESO therefore determined that it made sense to remove the submission timeline from the requirements of the rule and clarify the details on the different submittal processes, forms and timelines in an associated information document;
- The in-situ testing requirements have been incorporated in subsection 8;
- The restoration process in subsection 10 has been simplified;
- Subsection 7 has been amended to remove the requirement for a legal owner of a revenue meter to validate metering equipment and data using reasonable methods, and alternative data sources. Subsection 7 now requires the legal owner of the revenue meter to maintain validation records; and
- The AESO made minor amendments for clarity.

A blackline indicating revisions from the initial draft to the proposed final draft of Section 502.10 is attached. It is the AESO's intent that the proposed final draft of Section 502.10 provide participants with a clear understanding of the minimum technical and operating requirements for revenue meters in Alberta. Supporting documentation, in the form of an information document, associated measurement point definition record form and any other relevant documentation, may be posted to the AESO website upon approval by the Alberta Utilities Commission ("Commission") of the proposed final draft of Section 502.10.

Associated Terms and Definitions

Throughout the development of the proposed final draft of Section 502.10 the AESO determined that a number of new terms and definitions, amendments to existing definitions and the removal of an existing definition were required to support the proposed final draft of Section 502.10.

The following new terms and definitions are being proposed for adoption in the ISO rules and inclusion in the AESO's CADG:

- (a) "measurement point";
- (b) "measurement point definition record";
- (c) "revenue meter"; and
- (d) "revenue metering system".

Amendments to the following existing definitions are being proposed for adoption in the ISO rules and inclusion in the AESO's CADG:

- (a) "metered demand";
- (b) "metered energy"; and
- (c) "metering equipment".

Additionally, the removal from the CADG of the existing term and definition "meter" is being proposed for the ISO rules. This defined term is currently not used in any existing AESO authoritative document.

The AESO has considered all past Stakeholder feedback on the initial draft of the terms and definitions and has developed a revised draft of proposed terms and definitions for Stakeholder review. A blackline indicating revisions to the terms and definitions is attached.

Stakeholder Comments

Stakeholders may submit written comments to the AESO using the *Stakeholder Comment Matrix – Proposed Final Draft of Section 502.10* and *Stakeholder Comment Matrix – Section 502.10 Terms and Definitions*. The AESO will only consider written comments in finalizing the proposed final draft of Section 502.10, and terms and definitions. Stakeholders should ensure that comments provided represent all interests within their organization. The scope of comments is limited to the proposed final draft of Section 502.10, and terms and definitions. The AESO will not consider any comments that are outside of this scope.

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 final draft of Section 502.10, and terms and definitions.

The deadline for Stakeholders to provide comments is January 8, 2021, to 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 and the AESO's responses on the AESO website.

If no comments are received by the AESO regarding the proposed final draft of Section 502.10, and terms and definitions, the AESO will proceed to apply to the Commission for approval of the proposed final draft of Section 502.10, and terms and definitions.

Related Materials

The below documents are located on the AESO's [Stakeholder engagement page](#):

1. *Stakeholder Comment Matrix – Proposed Final Draft of Section 502.10*;
2. *Stakeholder Comment Matrix – Section 502.10 Terms and Definitions*;
3. Clean copy of the proposed final draft of Section 502.10;
4. Blackline of the proposed final draft of Section 502.10 from previous version posted November 18, 2019; and
5. Copy of the proposed new and amended terms and definitions.

Sincerely,

Jodi Marshall

Legal Manager, ISO Rules and Alberta Reliability Standards
Legal and Regulatory Affairs
rules_comments@aeso.ca

Attachments