

November 29, 2018

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

**Re: Letter of Notice for Development of a Proposed New ISO Rule – Section 502.10, Revenue Metering Technical Requirements (“Section 502.10”)**

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 proposed new Section 502.10.

#### **Issue**

The current AESO Measurement System Standard (the “Standard”) was developed in 2004, and the latest revision to the Standard was made on September 18, 2007. The Standard expired in February 2013. The new Section 502.10 is intended to replace the Standard.

#### **Objectives/Purpose**

Proposed new Section 502.10 will apply to the AESO and legal owners of revenue metering systems and will identify and define the minimum technical requirements of revenue metering systems and the associated metering data submissions.

#### **Background**

Notwithstanding the expiration of the Standard in February 2013, the AESO’s project functional specifications have continued to reference the Standard. The AESO, however, has always committed to developing a technical ISO rule to replace the Standard.

#### **Consultation Completed to Date**

An industry work group, composed of legal owners of transmission facilities, legal owners of electric distribution systems, the Commission, and a metering data service provider was established in December 2016.

Between January 2017 and June 2017, the AESO organized and facilitated four meetings with the work group to review, identify, prioritize, and discuss the issues and solutions related to the minimum technical requirements for revenue metering systems. Industry work group meetings were held on the following dates:

- January 27, 2017;
- March 3, 2017;
- April 28, 2017, and
- June 28, 2017.

Members of the work group included representatives from the following organizations:

| Organization                 |
|------------------------------|
| Alberta Utilities Commission |
| AltaLink                     |
| ATCO                         |
| City of Lethbridge           |
| City of Red Deer             |
| ENMAX                        |
| EPCOR                        |
| FortisAlberta                |
| Rodan                        |
| TransAlta                    |

As noted in the October 11, 2016 Industry Technical Workgroup Terms of Reference for proposed new Section 502.10, meeting notes from these workgroups will not be posted on the AESO website.

The industry work group reviewed the Standard and proposed amendments to add clarity and eliminate confusion.

### **Proposed Consultation and Timeline**

The AESO is of the view that it has met the intention of sections 6.1 and 6.2 of AUC Rule 017 as a result of the consultation completed to date. Therefore, the AESO is proposing to move directly to issuing draft versions of the proposed new Section 502.10 and soliciting comments pursuant to section 6.3 of AUC Rule 017.

While stakeholders have had the opportunity to provide comment on whether a proposed ISO rule is needed, and on the information required in subsection 7.2(b) - 7.2(j) of AUC Rule 017 as part of the consultation completed to date, the AESO intends to provide stakeholders with the additional opportunity to provide comment on these matters in the matrices it issues pursuant to section 6.3 of AUC Rule 017.

The AESO proposes the following timeline for consultation:

- 1) December 18, 2018 - Post Stakeholder comments received on this Letter of Notice for Development of the proposed new Section 502.10;
- 2) January 11, 2019 - Post draft of the proposed new Section 502.10 for written comment;
- 3) February 4, 2019 - Deadline for submitting written comments on proposed new Section 502.10;
- 4) February 25, 2019 - Post all written comments and provide written responses to the comments; and
- 5) March 2019 – Make application to the Commission for approval of proposed new Section 502.10.

### **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 new Section 502.10.

Please use the *Stakeholder Comment Matrix – Development of Proposed ISO Rule* 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 on the proposed development of an ISO rule and form of consultation is December 14, 2018 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 on December 18, 2018.

If no comments are received by the AESO regarding the development of proposed new Section 502.10, the AESO will post a draft of the proposed new Section 502.10 for written consultation.

### **Related Materials**

1. [\*Stakeholder Comment Matrix – Development of Proposed ISO Rule for the proposed new ISO rule Section 502.10;\*](#)
2. [\*AESO Measurement System Standard, September 18, 2007\*](#); and
3. [\*Industry Technical Workgroup Terms of Reference \(Draft\), October 11, 2016.\*](#)

Sincerely,

*Alison Desmarais*

Regulatory Coordinator  
Legal & Regulatory Affairs  
[alison.desmarais@aeso.ca](mailto:alison.desmarais@aeso.ca)  
403-539-2866