

January 5, 2020

To: Market Surveillance Administrator, Market Participants and Other Interested Parties (“Stakeholders”)

Re: **Letter of Notice for Administrative Amendments to Section 502.8 of the ISO rules, SCADA Technical and Operating Requirements (“Section 502.8”)**

Pursuant to Section 10 of Alberta Utilities Commission Rule 017: *Procedures and Process for Development of ISO Rules and Filing of ISO Rules with the Alberta Utilities Commission* (“AUC Rule 017”), the Alberta Electric System Operator (“AESO”) is providing notice and seeking feedback from Stakeholders on administrative amendments to Section 502.8.

Issue

In support of the Government of Alberta’s *Red Tape Reduction Initiative*, the AESO is committed to reducing regulatory requirements by one-third by 2023. To achieve this, the AESO is reviewing its authoritative documents and exploring opportunities to reduce its regulatory requirements.

The AESO has reviewed Section 502.8 and determined that there is an opportunity to streamline several repetitive provisions and perform other administrative updates. The proposed amended Section 502.8 would result in a reduction of 1444 regulatory requirements, as defined by the Government of Alberta, and represents almost a 5% reduction of the AESO’s overall red tape count.

Purpose

The AESO has performed a review of Section 502.8 and is proposing administrative amendments that will reduce and streamline regulatory requirements. In addition, the AESO is proposing other administrative amendments that will correct typographical errors, update current drafting style to align with AESO’s drafting principles and clarify the language of the ISO rule without changing its effect. The AESO is also proposing the removal, and consolidation of some provisions of Section 502.8 in order to improve clarity, reduce repetition, and reduce overall requirements.

Proposed Consultation and Timeline

The AESO is of the opinion that the scope of the issues identified is relatively minimal. Therefore, the AESO is targeting completion of Stakeholder consultation for the proposed amended Section 502.8 by Q1 2021. The AESO proposes Stakeholder consultation for the administrative amendment on the proposed amended Section 502.8 by way of a written process as follows:

- 1) January 5, 2021 – the AESO has posted a blacklined and clean copy of the proposed amended Section 502.8 for written comment;
- 2) January 22, 2021 – the AESO will provide approximately 2 and a half weeks for Stakeholders to submit written comments on the drafts of the proposed amended Section 502.8 with comments due January 22, 2021;
- 3) February 2021 – the AESO will post all written comments from Stakeholders and provide the AESO’s written responses to Stakeholder comments; and
- 4) February/March 2021 – provided there are no outstanding Stakeholder concerns, the AESO will submit an application to the Alberta Utilities Commission (“Commission”) for approval of the proposed amended Section 502.8.

Please note that due to significant changes to the table format in the appendices, a true blackline of the changes was impossible to create. The blackline copy of the proposed amended Section 502.8 that is provided as an attachment to this letter indicates that the appendices are net new content. This is not accurate as there are existing appendices in the current Section 502.8. To assist Stakeholders with their review of the proposed changes, a pdf version of the tracked changes of the appendices is also included as an attachment to this letter.

Stakeholder Comments

Stakeholders may submit written comments to the AESO by using the *Stakeholder Comment Matrix – Administrative Amendments to an ISO Rule*. Stakeholders should ensure that comments provided represent all interests within their organization.

The deadline for Stakeholders to provide comments is January 22, 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 post all comments it receives on the AESO's website. Pursuant to Rule 017, the AESO will provide written responses to the comments received and post those responses on the AESO's website. The AESO is posting this notice pursuant to the requirements in AUC Rule 017 and is proposing no further consultation. If the AESO does not receive any comments regarding the proposed amended Section 502.8, the AESO will proceed directly to filing an application with the Commission for approval.

Related Materials

1. *Stakeholder Comment Matrix – Administrative Amendments to an ISO Rule* for the proposed amended Section 502.8;
2. Blackline of proposed amended Section 502.8;
3. Pdf of the tracked changes to the appendices to Section 502.8; and
4. Clean copy of proposed amended Section 502.8.

Sincerely,

Jodi Marshall

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Legal & Regulatory Affairs

rules_comments@aeso.ca