

<p>Period of Comment: December 2, 2020 through January 8, 2021</p> <p>Comments From: TransCanada Energy Ltd. (TCE)</p> <p>Date [yyyy/mm/dd]: 2021/01/08</p>	<p>Contact: Mark Thompson</p> <p>Phone: 403-589-7193</p> <p>Email: markj_thompson@tcenergy.com</p>
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Instructions:

1. Please fill out the section above as indicated.
2. Please refer back to the *Letter of Notice of a Proposed Final Draft ISO Rule* under the “Attachments” section to view the materials regarding proposed final draft of Section 502.10 of the ISO rules, *Revenue Metering System Technical and Operating Requirements* (“Section 502.10”).
3. Please respond to the questions below and provide your specific comments, proposed revisions, and reasons for your position underneath (if any). Blank boxes will be interpreted as favourable comments.
4. Please be advised that general comments do not give the AESO any specific issue to consider and address, and results in a general response.

Item #		Stakeholder comments
1	Whether you understand and agree with the objective or purpose of the proposed final draft of Section 502.10 and whether, in your view, the proposed final draft of Section 502.10 meets the objective or purpose, and if not, why.	To the extent that the intended purpose or objective was to replace the <i>AESO Measurement System Standard</i> , TCE agrees that the proposed rule meets that objective.
2	Whether you agree that the proposed final draft of Section 502.10 is not technically deficient, and if not, why.	To date, TCE has not identified any technical deficiencies in the proposed rule.
3	Whether you agree with that the proposed final draft of Section 502.10, taken together with all ISO rules, supports a fair, efficient and openly competitive market, and if not, why.	The AESO has proposed that the legal owner be the party responsible for the metering technical and operating requirements even though they may not be the party responsible for conducting the work. Indeed, in some cases the legal owner does not have the necessary credentials to do the work. This is a change from the current practice and will increase costs to market participants and will not result in an efficient outcome. TCE submits that the efficient outcome would be for the party responsible for performing the

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		<p>work be the party responsible for meeting the requirement.</p> <p>Notwithstanding the above, TCE supports the AESO's in-situ testing frequency as set out in subsections 8(1) and (2) in the proposed rule. This testing frequency, and the calculations to determine the "MW Class" are reasonable considering the Measurement Canada testing interval and the fact that the AESO can request an in-situ test for the metering equipment if necessary.</p>
4	Whether you agree that the proposed final draft of Section 502.10 supports the public interest, and if not, why.	Please refer to TCE's comments to #3 above.
5	Any additional comments regarding the proposed final draft of Section 502.10.	No further comments at this time.

Please provide any additional comments or views on the type of content that should be included in an information document associated with the proposed final draft of Section 502.10

