

Participant Involvement Program (PIP) Guidelines for Transmission Facility Owners

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1. Purpose

These guidelines supplement the AESO's direction to an owner of transmission facilities (the "TFO") for assistance in completing the AESO's PIP¹ for system access service requests. Specifically, these guidelines (i) describe the AESO Directed PIP Work² (defined in the PIP direction letter), which will assist the AESO in meeting its PIP requirements under Alberta Utilities Commission (the "AUC") Rule 007: *Applications for Power Plants, Substations, Transmission Lines, Industrial System Designations and Hydro Developments* (the "AUC Rule 007") for system access service requests; and (ii) the AESO's rationale and expectations for PIP assistance by the TFO.

2. Background

Pursuant to Section 34(1) of the *Electric Utilities Act* (Alberta) (the "EUA"), when the AESO determines that an expansion or enhancement of the capability of the transmission system is or may be required to meet the needs of Alberta and is in the public interest, it must prepare and submit a needs identification document (the "NID") or abbreviated needs identification document (the "ANID") to the AUC for approval.

Pursuant to AUC Rule 007, the AESO is required to conduct a PIP when preparing a NID or ANID. ANIDs are typically required for system access service requests. AUC Rule 007 describes the requirements for the AESO's PIP, which may differ from the requirements of a TFO PIP when preparing its facility application.

The AESO also conducts PIPs for projects that are eligible for approval under Section 501.3 of the ISO rules, *Abbreviated Needs Approval Process* (the "ANAP"). For ANAP eligible projects, the AESO's PIP is conducted in accordance with the requirements for ANIDs or NIDs, as applicable.

As the AESO is engaging with, and being contacted by, numerous stakeholders on various initiatives throughout Alberta, it is important for the AESO to be aware of the content and timing of all transmission development notifications that stakeholders may receive. Among other things, these guidelines are meant to assist the AESO in ensuring the coordination and alignment of both the TFO Stakeholder Materials (as defined below) and the AESO stakeholder materials.

3. AESO's PIP Requirements from AUC Rule 007

For the AESO to advance a system access service request, the AESO must be able to provide the information requirements for a NID or an ANID, as applicable, as set out in AUC Rule 007.

AUC Rule 007 sets out specific requirements for the AESO's PIP. These include the following:

- The AESO must describe the PIP that was conducted.
(Rule 007: NID11 for NIDs; NID19, NID27, NID34 for ANIDs)
- The AESO must explain the rationale used to develop the PIP and the rationale that determined the extent of the PIP.
(Rule 007: NID11 for NIDs; NID19, NID27, NID34 for ANIDs)

¹ The AESO has determined that it is appropriate that the TFO assist the AESO in preparing the AESO's ANID or NID as applicable for the Project by completing certain components of the AESO's participant involvement program (PIP) to satisfy the requirements of Alberta Utilities Commission Rule 007 - *Applications for Power Plants, Substations, Transmission Lines, Industrial System Designations and Hydro Developments* ("AESO PIP").

² Those components of the AESO PIP being directed to the TFO to complete will be referred to as the "AESO Directed PIP Work".

- The AESO must summarize issues raised by participants, how these were addressed, and whether or not any issues are outstanding. Issues include those that relate to the AESO’s preferred option to meet the need or to respond to the system access service request, and the issues pertaining to the need itself.
(Rule 007: NID11 for NIDs; NID19, NID27, NID34 for ANIDs)
- The AESO must notify stakeholders (as defined in Section 2.1(a), Appendix A2 of AUC Rule 007) in the area in accordance with the consultation and notification requirements identified in Section 5, Appendix A1 of AUC Rule 007, including occupants, landowners, residents, First Nations³, and local authorities, agencies and governments, prior to submitting a NID or an ANID to the AUC.
(Rule 007: Appendix A2, Section 2.1(a) for NIDs, Section 2.2, Section 3.2(a) for ANIDs)
- For ANIDs, the TFO’s project-specific PIP notification materials must address the following items:
 - a description of the AESO’s preferred transmission development responding to the system access service request;
 - the general area where the facilities could be installed to implement the AESO’s preferred option; and
 - AESO contact information for further information.
 (Rule 007: Appendix A2, Section 3.2(a))
- For NIDs, the notification materials must address the following items:
 - a description of the need for transmission development;
 - a description of the AESO’s preferred option to meet this need;
 - the general area where the facilities could be installed to implement the AESO’s preferred option;
 - the proposed timing for submitting a NID to the AUC; and
 - AESO contact information for further information.
 (Rule 007: Appendix A2, Section 3.1)
- For both ANIDs and NIDs, the AESO must allow a minimum of 14 calendar days from the date that the stakeholder notification is distributed before publishing the AESO’s filing notification.
(Rule 007: Appendix A2 Section 3.1(c) for NIDs; and Section 3.2 (a) for ANIDs)
- For ANIDs, the AESO must notify stakeholders regarding the AESO’s intention to submit an ANID application to the AUC a minimum of 14 calendar days before filing. This notification can be fulfilled by posting on the AESO’s website and other stakeholder notifications.
(Rule 007: Appendix A2, Section 5.2)
- For NIDs, the AESO must notify stakeholders, on the AESO’s website and in local newspapers, regarding the AESO’s intention to submit a NID application to the AUC a minimum of 14 calendar days before filing. The notification materials must address the following items:
 - a description of the area where the facilities could be installed to implement the AESO’s preferred option;
 - a telephone number to contact for further information; and
 - a website location where the NID may be downloaded once submitted to the AUC.
 (Rule 007: Appendix A2, Section 5.1)

³ For the purpose of this document, the AESO interprets this to include Indigenous communities and organizations. Subsequent reference in this document will refer to Indigenous communities and organizations.

4. AESO's Direction to the TFO for PIP Assistance

Pursuant to Section 35 of the EUA, the AESO can direct the TFO to assist the AESO in preparing ANIDs or NIDs. Pursuant to Sections 39 and Section 14 of the *Transmission Regulation*, the TFO, as part of its duties, must, as directed by the AESO, assist the AESO in preparing its ANID or NID, as applicable. The AESO issues a direction to the TFO for PIP assistance when it has determined it is appropriate for the TFO to assist the AESO in preparing the AESO's ANID or NID, by completing certain components of the AESO's PIP. The direction refers the TFO to these guidelines and requires the TFO to complete the AESO Directed PIP Work in accordance with these PIP Guidelines.

Unless otherwise requested by the AESO, all deliverables in response to the direction should be provided by email to the project manager assigned to the project.

5. AESO PIP Plan

As part of the AESO Directed PIP Work, the TFO must submit to the AESO's project manager by email a plan of how the TFO will complete the AESO Directed PIP Work (the "AESO PIP Plan"). The AESO PIP Plan should clearly describe how the TFO plans to complete the AESO Directed PIP Work in accordance with AUC Rule 007 and the AESO direction letter.

The AESO PIP Plan must be approved by the AESO before it is implemented by the TFO. The TFO is expected to inform the AESO as soon as the TFO becomes aware of any changes to the accuracy or completeness of the information in the AESO PIP Plan.

As part of the AESO Directed PIP Work, the TFO must prepare an AESO PIP Plan that includes the following components:

(a) Statement of compliance

A statement confirming that the AESO Directed PIP Work will be completed in accordance with AUC Rule 007 and the AESO direction letter, with a reference to the date of the direction letter.

(b) Facility Application Type

A statement describing the type of facility application applicable to the project, as specified in AUC Rule 007, Appendix A1, Section 5, which will be used to inform the notification methodology described below.

(c) Notification Methodology

A statement providing the TFO's minimum notification area for the type of facility application, as specified in AUC Rule 007, Appendix A1, Section 5, with details of any planned deviations.

The statement should include a description of how the TFO intends to conduct notification and provide details of all anticipated notification methods (e.g., addressed mail, postal code drop, email, hand delivery). It should also specify what stakeholder materials will be distributed for each of the planned distribution methods.

(d) Timeline

A timeline with the following information:

- Estimated dates of when the stakeholder materials will be distributed, for each planned distribution method. This information may be broken down according to stakeholder group, as appropriate.
- Estimated dates, times, and locations of open houses and information sessions, if applicable. If no open houses or information sessions are planned, a statement confirming this and explaining

the rationale for the TFO's decision not to host any open houses is required. An acceptable rationale could be that "*open houses are not required for this project*".

- Estimated release or posting dates of other types of planned communications (e.g., website posting, social media announcement of open house dates), if applicable.
- Estimated completion date for the PIP activities.

(e) Stakeholder List

Provide a list that describes the stakeholders to be notified and the TFO's rationale for their inclusion in the AESO Directed PIP Work. The rationale for *excluding* certain stakeholders or stakeholder groups from the AESO Directed PIP Work is also required.

For organizations such as local authorities, elected officials, agencies, government bodies, industries, and stakeholder groups, the stakeholder list should include the name of each representative of the organization to be notified, as available.

For all occupants, residents and landowners, the list should not include these stakeholders' personal information and instead should state the approximate number of these stakeholders.

(f) Notification of Indigenous Communities

Provide a list of all Indigenous communities and organizations in the development area, together with a rationale explaining whether they are to be included or excluded from the notification. If the TFO seeks advisement from the Aboriginal Consultation Office (the "ACO") the TFO must provide⁴ a copy of the ACO's assessment whether notification was or was not required. If the TFO did not seek advisement from the ACO, the TFO must summarize the steps it took to identify and notify with Indigenous groups. If none were undertaken, the TFO must provide an explanation for that decision.

(g) Risk Level

For ANAP projects, the TFO must identify if the perceived risk of stakeholder concerns is high, medium, or low. For ANID projects, this is optional and at the discretion of the TFO.

6. TFO Stakeholder Materials

As part of the TFO's PIP, the TFO will prepare project-specific information documents that include a description of the facilities (the "TFO Stakeholder Materials"). The TFO Stakeholder Materials must be aligned with the AESO's stakeholder materials.

As part of the AESO Directed PIP Work, the AESO requires the TFO to follow the following processes to ensure the alignment between the AESO PIP and TFO PIP:

- (a) TFO Stakeholder Materials include any materials that are distributed with the AESO Need Overview (defined below), or make reference to the AESO's role, the AESO's need, or the AESO's preferred alternative. This may include, but is not limited to the following materials as available at the time of AESO PIP Plan development:
 - brochures (which contain site plans or maps)
 - newsletters (which contain site plans or maps)
 - poster boards for open houses/public information sessions
 - advertisements (print and/or electronic)

⁴ Alberta Utilities Commission Bulletin 2019-20 *Interim direction on Indigenous consultation*

- web pages
- social media posts

The TFO must provide all TFO Stakeholder Materials to the AESO project manager for review and approval. The AESO will advise the TFO of any changes required to the TFO Stakeholder Materials as applicable to AESO's role, the AESO's need, or the AESO's preferred alternative, and will not proceed to provide the AESO Need Overview (defined below) until such changes have been made.

- (b) The TFO Stakeholder Materials provided to the AESO for review, specifically the TFO's newsletter/letter/brochure, must include the following paragraph and the AESO's contact information:

"The AESO is an independent, not-for-profit organization responsible for the safe, reliable and economic planning and operation of the provincial transmission grid. For more information about why this project is needed, please refer to the AESO's Need Overview included with this package, or visit www.aeso.ca. If you have any questions or concerns about the need for this project or the proposed transmission development to meet the need you may contact the AESO directly. You can make your questions or concerns known to a transmission facility owner representative who will collect your personal information for the purpose of addressing your questions and/or concerns to the AESO. This process may include disclosure of your personal information to the AESO."

"Alberta Electric System Operator (AESO)
 stakeholder.relations@aeso.ca
 1-888-866-2959
 www.aeso.ca"

- (c) The AESO will prepare an AESO Need Overview which is an overview that outlines the need for the project and includes AESO contact information (the "AESO Need Overview"). The AESO Need Overview must be distributed with the TFO Stakeholder Materials, specifically the TFO's newsletter/letter/brochure. The AESO Need Overview will be provided to the TFO upon completion of the AESO's review and approval of the TFO Stakeholder Materials.

The TFO must coordinate with the AESO regarding subsequent distributions to stakeholders that include changes to, or new TFO Stakeholder Materials.

7. Notifications to the AESO

As part of the AESO Directed PIP Work, the AESO requires the following notifications from the TFO:

(a) Confirmation of Distribution

The TFO must confirm to the AESO project manager when the initial distribution of the TFO Stakeholder Materials along with the AESO Need Overview has been distributed to all stakeholders, and provide a copy of the TFO Stakeholder Materials to the AESO.

(b) Deviations

The TFO must inform the AESO of any deviations from the PIP Plan as they occur. The AESO understands that the stakeholder list may change and may be updated during the PIP. As such, the TFO should notify the AESO periodically as the preliminary stakeholder list is updated to ensure coordination and alignment of the PIP activities between the two parties.

(c) Stakeholder Questions

Within seven days of the TFO receiving stakeholder questions or concerns regarding the need to respond to the request for system access service and/or AESO's preferred option to respond to the request for system access service, the TFO must refer such questions or concerns to the AESO for the AESO's response. This will allow the AESO to promptly address stakeholder concerns. The TFO shall attempt to obtain stakeholder consent to forward their contact information to the AESO when questions relevant to the AESO are received.

Should the AESO receive any questions or concerns that pertain to the TFO's facility application and upon receiving permission from the stakeholder to share his or her contact information, the AESO will ensure these are made available to the TFO within seven days.

8. PIP Report

The TFO must prepare a report (the "PIP Report") executed by an authorized representative of the TFO and delivered to the AESO's project manager by email confirming that the TFO completed the AESO Directed PIP Work and in particular must confirm that the AESO Directed PIP Work was completed in accordance with: (i) the direction, and (ii) the requirements of AUC Rule 007, as applicable. The PIP Report must also list and explain the deviations, if any, from: (i) the direction; (ii) the requirements of AUC Rule 007, as applicable; and (iii) the approved AESO PIP Plan.

If new stakeholders are identified and notified after the PIP Report has been submitted, the AESO expects the TFO to promptly inform the AESO to ensure compliance with the requirements of AUC Rule 007, Appendix A2, Section 3.1(c) for NIDs or Section 3.2(a) for ANIDs. The PIP Report should then be updated accordingly.

The objective of the PIP Report is to describe all the activities that actually occurred during the AESO Directed PIP Work. The PIP Report is used to inform the AESO's PIP Summary that is filed with the AUC as a component of the AESO's NID or ANID. The AESO's PIP Summary is also used to inform the AESO's evaluation of ANAP eligibility for projects. TFOs are reminded that the PIP Report may become an exhibit in related AUC proceedings, and such reports should be prepared with this outcome in mind.

The PIP Report should include the following components:

(a) Statement of Compliance

A statement confirming that the AESO Directed PIP Work was conducted in accordance with AUC Rule 007 and the AESO direction letter, with a reference to the date of the direction letter.

(b) Facility Application Type

A statement providing the type of facility application applicable to the project, as specified in AUC Rule 007, Appendix A1, Section 5.

(c) Notification Methodology

A statement of the TFO's minimum notification area for the type of facility application, as specified in AUC Rule 007, Appendix A1, Section 5. Provide details of any deviations that occurred during completion of the PIP.

This should include a description of how notification was conducted, including details of all notification methods used (e.g., addressed mail, postal code drop, email, hand delivery), and specifying which stakeholder materials were distributed for each distribution method used.

(d) Timeline

A timeline with the following information:

- Actual date(s) of stakeholder material distribution, for each distribution method used. This information may be broken down by stakeholder group, as appropriate. If there were several rounds of notification that were distributed with the AESO's materials or that spoke to the arrangements being made by the AESO, then provide the start and end date of each round.
- Dates, times, and locations of open houses and information sessions, if applicable. If no open houses or information sessions were held, a statement confirming this and explaining the rationale for the TFO's decision is required. An acceptable rationale could be that "*open houses are not required for this project*".
- Release or posting dates for all other communications (e.g., website posting, social media announcement of open house dates), if applicable.
- Posting date and URL for any project-specific information (including the AESO Need Overview) posted on the TFO website. Specify which materials were posted. If no materials were posted on the TFO website, then provide a statement confirming this.
- Actual date of notification completion (i.e. when the last stakeholder received a project-specific information package that included the AESO Need Overview) at the time of PIP Report submission. This allows the AESO to determine the earliest date that it can publicly notify of its intent to file an ANID or a NID with the AUC.

(e) Stakeholder List

Provide a list that includes the stakeholders that were notified and the TFO's rationale for their inclusion in the AESO Directed PIP Work. The rationale for *excluding* certain stakeholders or stakeholder groups from the AESO Directed PIP Work is also required.

For organizations such as local authorities, elected officials, agencies, government bodies, industries, and stakeholder groups, the stakeholder list should include the name of each representative of the organization that was notified, as available.

For all occupants, residents and landowners, the list should not include these stakeholders' personal information and instead should state the approximate number of these stakeholders.

(f) Notification of Indigenous Communities

Provide a list of all Indigenous communities and organizations applicable to the development area that were notified. If the TFO did not seek advisement from the ACO, the TFO must provide a rationale explaining why Indigenous communities and/or organizations were or were not included in the AESO Directed PIP Work. If no steps were undertaken to identify and notify with Indigenous groups, the TFO must provide an explanation for that decision.

(g) Deviations

Include any deviations from, or additions to, the AESO PIP Plan and provide the corresponding rationale.

(h) Questions and Concerns Received

Describe all questions and concerns received by participants regarding the need to respond to the request for system access service and/or AESO's preferred option to respond to the system access service request. If there were no questions or concerns raised, then provide a statement indicating that there were no questions or concerns regarding the need to respond to the request for system access service and/or the AESO's preferred option to respond to the request for system access service, as appropriate.

(i) Stakeholder Materials

Attach all TFO Stakeholder Materials that were distributed or otherwise made available to stakeholders during the AESO Directed PIP Work as appendices to the PIP Report.

TFO Stakeholder Materials include any materials that were distributed with the AESO's Need Overview, or make reference to the AESO's role, the AESO's need, or the AESO's preferred alternative. This may include, but is not limited to the following materials:

- brochures (which contains site plans or maps)
- newsletters (which contains site plans or maps)
- poster boards for open houses/public information sessions
- advertisements (print and/or electronic)
- web pages
- social media posts