

January 17, 2013

Alberta Utilities Commission  
Fifth Avenue Place  
400, 425 – 1<sup>st</sup> Street SW  
Calgary, Alberta T2P 3L8

Attention: Darin Lowther,  
Director of Markets

Dear Mr. Lowther:

**Re: Bulletin 2012-20**  
**Specified penalties for Alberta Electric System Operator expedited core market ISO rules – expedited changes to AUC Rule 019**

The Alberta Electric System Operator (“AESO”) has reviewed Bulletin 2012-20, dated December 21, 2012, and has the following comments:

1. The AESO supports the inclusion of the “expedited changes” in AUC Rule 019.
2. The AESO also supports the inclusion of the “other changes requested by the MSA” in AUC Rule 019. In particular, the inclusion of ISO Rules 201.3, 301.2, 505.3 and 505.4:
  - (a) address ISO rules that have been and are expected to be the focus of AESO compliance screening and referral to the Market Surveillance Administrator (MSA);
  - (b) allows for the efficient handling of referrals regarding these ISO rules to the MSA; and
  - (c) provides effective incentive for behavioral change.

The AESO notes that ISO rule 301.2 replaces obligations previously set out in OPP 806 and which are critical to the AESO’s maintenance of the security of the Alberta interconnected electric system.

The AESO appreciates the opportunity to comment on these amendments to the specified penalty tables of AUC Rule 019.

Sincerely,

<original signed by>

Heidi Kirrmaier  
Vice-President, Regulatory

cc: