

Revisions to AUC Rule 019: Specified Penalties for Contravention of ISO Rules
Stakeholder Comments and AUC Responses Matrix
Comment Period – December 21, 2012 to January 17, 2013

Issue / Topic	AUC Response
Issue 1: Overall comments	
<p>Alberta Electric System Operator</p> <p>The Alberta Electric System Operator (“AESO”) has reviewed Bulletin 2012-20, dated December 21, 2012, and has the following comments:</p> <ol style="list-style-type: none"> 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: <ol style="list-style-type: none"> (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. <p>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.</p> <p>ATCO Power Ltd.</p> <p>Thank you for the opportunity to comment on the proposed changes to AUC rule 019.</p>	<p><u>Expedited changes to AUC Rule 019</u></p> <p>All parties that provided comments to the Commission supported, expressed no concerns or did not oppose the expedited changes to the specified penalty table of AUC Rule 019 that were outlined in Bulletin 2012-20.</p> <p>Accordingly, the Commission will not modify the amendments to AUC Rule 019 that became effective on January 8, 2013.</p> <p><u>Other changes requested by the MSA</u></p> <p>The AESO supported the other changes requested by the MSA, and made particular note of ISO rules Section 201.3, 301.2, 505.3 and 505.4. Capital Power had no concerns with the other changes proposed by the MSA to modify the specified penalty table to ensure consistency with ISO rules that previously became effective at various dates throughout 2012. ATCO Power had no substantive comments and ENMAX did not oppose the changes proposed by the MSA.</p> <p>The Commission has reviewed the changes proposed by the MSA and, with the clarification provided by the AESO regarding ISO rules Section 301.2, is of the view that the changes proposed by the MSA are largely administrative in nature, and serve to include in the specified penalty table ISO rules that were replaced at various dates throughout 2012. As such, the Commission will approve the changes requested by the MSA.</p>

Issue / Topic	AUC Response
<p>ATCO Power has no substantive comments regarding the proposed revisions.</p> <p>Capital Power Corporation</p> <p>Capital Power appreciates the opportunity to provide this response to the Alberta Utilities Commission (Commission) Bulletin 2012-20, dated December 21, 2012, which requested comments on the revision of AUC Rule 019: <i>Specified Penalties for Contravention of ISO Rules</i> on an expedited basis in order to ensure continuity in the enforcement of ISO rules.</p> <p>In December 2012, the Alberta Electric System Operator (AESO) filed an application with the Commission to add, amend, and remove a number of ISO rules on an expedited basis, which the AESO characterized as expedited core market rules changes. Subsequently, the MSA requested a revision to the penalty table in AUC Rule 019 in association with the AESO filing. In addition to the amendments requested by the Market Surveillance Administrator (MSA) to the penalty table contained in AUC Rule 019, that were made effective by the Commission as of January 8, 2013, the Commission is also considering further modifications to Category 1 of the penalty table that are not part of the expedited core market rules filings.</p> <p>Capital Power’s understanding from reviewing both the Commission’s notice and the MSA’s letter dated December 14, 2012 is that the modifications requested by the MSA at this time are intended solely to maintain administrative consistency and accuracy with the rules identified within the penalty, and specifically that no changes to the dollar amounts of any of the specified penalties are being proposed by either the AESO or the MSA. On this basis, Capital Power has no concerns with the administrative modifications to Categories 1, 2, and 3 being proposed in relation to the expedited core market rules that became effective on January 8, 2013.</p> <p>Capital Power also has no concerns with the additional changes proposed by the MSA to modify the penalty table in order to ensure consistency with ISO rules that previously became effective at various dates throughout 2012. Capital Power understands that the Commission has not yet proposed an effective date associated</p>	

Issue / Topic	AUC Response
<p>with these changes.</p> <p>ENMAX Energy Corporation (ENMAX)</p> <p>In response to the Alberta Utilities Commission’s request for feedback regarding the amendments to AUC Rule 019 dated December 21, 2012, ENMAX Energy Corporation (“EEC”) does not oppose the changes as proposed by the MSA in AUC Bulletin 2012-20.</p> <p>In addition, EEC has no objection to the request to expedite these changes to maintain consistency and continuity in relation to the MSA’s enforcement activities.</p>	