



October 17, 2014

Greg Andrews,
Analyst, Markets Division
Alberta Utilities Commission

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Re: Bulletin 2014-13 Consultation on AUC Rule 019: Specified Penalties for Contravention of ISO rules

Dear Mr. Andrews,

TransCanada Energy Ltd. (TCE) appreciates the Alberta Utilities Commission (the Commission) posting Bulletin 2014-13 for stakeholder consultation and input and as such offers the following comments.

TCE understands that the Commission is proposing to move ISO rules 3.6.2, 3.6.3 and Section 203.3 from Category 2 to Category 3 to align with ISO rules Section 203.6. While TCE understands that there is some overlap between certain portions of these rules/Sections, TCE submits that this is insufficient justification to raise the entire rules/Sections to Category 3. When these rules were placed in the Penalty Table they were consciously put into the Categories believed to best correspond with each rule.

TCE disagrees with these proposed changes and suggests the appropriate resolution to the overlapping of these rules/Sections is for the AESO to revise the rules to eliminate the overlap. Market Participants have long been concerned about a single action leading to sanctions under more than one rule/Section (incorrectly, but commonly, referred to as “double jeopardy”) and raised this issue with the AESO on numerous occasions. TCE suggests that the Commission could alert the AESO to this situation. As well TCE will work with other Market Participants to raise this issue with the AESO so that it can be appropriately addressed.

Should you wish to discuss any of this further, I can be reached at (403) 920-2081 or via e-mail (chris_best@transcanada.com)

Regards,

TransCanada Energy, Ltd.

Original Signed by

Chris Best
Manager Market Services
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