



Alberta Electric System Operator

2017 ISO Tariff Update

April 4, 2017

Alberta Utilities Commission
Decision 22093-D02-2017
Alberta Electric System Operator
2017 ISO Tariff Update
Proceeding 22093

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Contents

1 Introduction and process..... 1

2 Background 3

3 Details of the application 4

4 Commission findings..... 7

5 Order..... 10

Appendix 1 – Proceeding participants 11

List of tables

Table 1. Summary calculation of 2017 wires cost forecast using the AESO proposed method..... 8

Table 2. Calculation of 2017 wires cost forecast using the previously approved method... 8

Table 3. Calculation of 2017 wires cost forecast using the previously approved method with the removal of the refund of previously collected credit metric relief amounts..... 9

1 Introduction and process

1. In this decision, for the reasons set out below, the Alberta Utilities Commission has approved the Alberta Electric System Operator's (AESO) 2017 Independent System Operator (ISO) tariff update.

2. The AESO filed an application with the Commission on October 20, 2016, pursuant to sections 30 and 119 of the *Electric Utilities Act*, seeking approval of its 2017 ISO tariff update.

3. The Commission issued notice of the application on October 21, 2016, requesting that any statements of intent to participate (SIP) be filed by November 4, 2016. In response to the notice, SIPs were received from:

- Desiderata Energy Consulting Inc. as representative for the Dual Use Customers
- Alberta Direct Connect Consumers Association
- AltaLink Management Ltd.
- ATCO Electric Ltd.
- EPCOR Distribution & Transmission Inc.
- Office of the Utilities Consumer Advocate (UCA)

4. The Commission issued a letter on November 8, 2016, which established the following process schedule:

Process step	Deadline
Information requests (IRs) to the AESO	November 22, 2016, 4 p.m.
Information responses from the AESO	December 6, 2016, 4 p.m.
Comments on the need for further process	December 13, 2016, 4 p.m.

5. The AESO sought to implement the proposed tariff updates with an effective date of January 1, 2017, and, therefore, requested approval of its application (on an interim or final basis) by December 28, 2016.¹ Following a brief process focused on this issue, the Commission approved the 2017 ISO tariff update effective January 1, 2017, on an interim refundable basis in Decision 22093-D01-2016.²

¹ Exhibit 22093-X0008, AESO 2017 ISO Tariff Update - Application, paragraph 10, page 3 of 25.

² Decision 22093-D01-2016: Alberta Electric System Operator, 2017 ISO Tariff Update – Interim Approval, Proceeding 22093, December 2, 2016.

6. In accordance with the process schedule set out by the Commission, IRs were submitted to the AESO on November 22, 2016, with the AESO providing its responses on December 6, 2016.
7. In response to the need for further process, ATCO Electric Ltd. submitted a motion³ to compel further and better responses from the AESO to ATCO Electric IRs and to request changes in the terms and conditions from the 2018 ISO tariff application to be applied retrospectively to the Jasper Interconnection project (Proceeding 22125). The UCA indicated that it did not require further process, but reserved the right to participate should the need arise.⁴
8. On December 23, 2016, the Primary Service Group (PS Group) filed a statement of intent to participate and further requested:
- (a) the AUC to direct that the AESO amend the Statement of Account format so that it shows the charges primary service customers are actually liable for, being the Rate DTS [demand transmission service] Connection Charge net of the primary service credit for Rate DTS customers eligible for Rate PSC;
 - (b) alternatively, since Exhibit 21735-X0060 in Proceeding 21735, (the DAR [deferral account reconciliation] Proceeding Application) indicates that there are presently 42 system access service points eligible for Rate PSC, if the AESO cannot amend its billing system immediately to show the amount of Rate DTS Connection Charges (net of the primary service credit) and on a single line of the Statement of Account, to direct the AESO to manually amend the invoices for the 42 service points eligible, until such time as the AESO's billing system can be modified; and
 - (c) such other and further relief and/or process as the AUC may consider appropriate.⁵
9. In a letter dated February 1, 2017, the Commission issued a ruling on the motions from ATCO Electric and the PS Group, and sought additional information in follow-up to the AESO's response to IR AESO-AUC-2016NOV22-002(c). In the ruling, the Commission denied ATCO Electric's motion for further and better IR responses, approved ATCO Electric's request to have changes in the terms and conditions from the 2018 ISO tariff application applied retrospectively to the Jasper Interconnection project and dismissed the PS Group's request.⁶
10. In the Commission's request for additional information, the AESO was asked to provide the following:
- (i) provide the impact to Rate DTS customers Rider C, with calculations, if the Commission were to approve the AESO's proposed change to the way it has calculated its forecast wires costs

³ Exhibit 22093-X0034, 2016-12-12 AE motion and comments on need for further process.

⁴ Exhibit 22093-X0036, UCA letter on further process.

⁵ Exhibit 22093-X0038, Primary Service Group – request submission regarding the ISO 2017 Interim Tariff, paragraph 21.

⁶ Exhibit 22093-X0050, AUC letter - Commission ruling on AE motion, PS Group request and Commission-initiated request for comments.

- (ii) provide the impact to Rate DTS customers Rider C, with calculations, if the Commission were to deny the AESO's proposed change to the way it has calculated its forecast wires costs.⁷

11. The Commission established the following process for the additional information to be provided by the AESO:

Process step	Deadline dates
AESO to provide follow-up information to IR AESO-AUC-2016NOV22-002(c)	February 8, 2017, 4 p.m.
Interested party submissions on the follow-up information and the impact to Rider C, and comments for further process	February 15, 2017, 4 p.m.

12. The requested information was submitted by the AESO on February 8, 2017. The Commission did not receive comments on the AESO's submission or requests for further process. The Commission considered the close of record for this proceeding to be February 15, 2017, the date at which submissions were due in response to the AESO's supplemental information.

2 Background

13. In Decision 2010-606,⁸ the Commission approved the AESO's proposed methodology to complete annual tariff update filings between its major tariff applications.

14. The AESO's most recent major tariff application was filed on July 17, 2013, for which the AESO sought approval from the Commission for its 2014 ISO tariff. Following a compliance filing process, the Commission approved the current form of the 2014 ISO tariff, effective July 1, 2015, in Decision 3473-D01-2015 (Errata).⁹ The AESO filed a 2015 annual tariff update application on August 18, 2015, to reflect costs and billing determinants for the 2015 calendar year. The 2015 annual tariff update application was approved effective January 1, 2016, on an interim basis in Decision 20753-D01-2015¹⁰ and approved on a final basis in Decision 20753-D02-2015.¹¹

15. The AESO filed a 2016 annual tariff update application on February 2, 2016, to reflect costs and billing determinants for the 2016 calendar year. The 2016 annual tariff update

⁷ Exhibit 22093-X0050, AUC letter - Commission ruling on AE motion, PS Group request and Commission-initiated request for comments, paragraph 53.

⁸ Decision 2010-606: Alberta Electric System Operator, 2010 ISO Tariff, Proceeding 530, Application 1605961-1, December 22, 2010.

⁹ Decision 3473-D01-2015 (Errata): Alberta Electric System Operator, 2014 ISO Tariff Compliance Filing Pursuant to Decision 2014-242, Module 1, Proceeding 3473, Application 1610935-1, June 17, 2015.

¹⁰ Decision 20753-D01-2015: Alberta Electric System Operator, 2015 ISO Tariff Update – Interim Approval, Proceeding 20753, November 16, 2015.

¹¹ Decision 20753-D02-2015: Alberta Electric System Operator, 2015 ISO Tariff Update, Proceeding 20753, December 21, 2015.

application was approved effective April 1, 2016, on a final basis, in Decision 21302-D01-2016.¹²

16. The AESO filed this application to reflect costs and billing determinants for the 2017 calendar year.

3 Details of the application

17. The AESO requested approval of its 2017 ISO tariff update application, including the amounts set out in Appendix C to the application¹³ and the proposed 2017 ISO tariff Rate DTS (demand transmission service), Rate FTS (Fort Nelson demand transmission service), Rate DOS (demand opportunity service), Rate XOS (export opportunity service), Rate XOM (export opportunity merchant service), Rate PSC (primary service credit), Rate STS (supply transmission service), Rider J and Section 8 set out in Appendix E¹⁴ to the application.¹⁵

18. As noted above, the AESO requested that the application be approved effective January 1, 2017; however, if the timing of the application did not permit the granting of final approval prior to January 1, 2017, the AESO requested that the Commission approve the application on an interim basis, effective January 1, 2017. The AESO also requested that the Commission issue its approval, whether on an interim or final basis, on or before December 28, 2016.¹⁶

19. The AESO explained that the updated rates proposed in the application would apply on a go-forward basis only, commencing from the effective date approved by the Commission and that the currently approved deferral account rider and reconciliation mechanism would continue to be used to address any variances between costs and revenue occurring prior to the approval of the applied-for rates. As such, the AESO confirmed that it was not seeking any retroactivity with respect to the rates proposed for approval in its application.¹⁷

20. The AESO stated that the 2017 forecast costs represented an increase of \$46.3 million, or 2.2 per cent, over the 2016 forecast costs. The increase primarily resulted from a forecast increase of \$44.9 million, or 2.7 per cent, in wires costs reflected in recent transmission facility owner (TFO) tariff applications.¹⁸

21. In accordance with the methodology approved in Decision 2010-606, the AESO's 2017 ISO tariff update used the rate calculation methodology approved by the Commission in Decision 3473-D01-2015 (Errata) in conjunction with the AESO's 2014 ISO tariff application. Specifically, the AESO used the 2014 rate calculations provided in Appendix B of the AESO

¹² Decision 21302-D01-2016: Alberta Electric System Operator, 2016 ISO Tariff Update, Proceeding 21302, March 31, 2016.

¹³ Exhibit 22093-X0003.

¹⁴ Exhibit 22093-X0005.

¹⁵ Exhibit 22093-X0008, application, paragraph 87.

¹⁶ Exhibit 22093-X0008, application, paragraph 10.

¹⁷ Exhibit 22093-X0008, application, paragraph 10.

¹⁸ Exhibit 22093-X0008, application, paragraph 14.

2014 ISO tariff compliance filing as the template for the 2017 rate calculations.¹⁹ These rate calculations used the following inputs:²⁰

- 2017 forecast revenue requirement
- functionalization of wires costs approved for 2016 in Decision 2013-421²¹
- 2017 forecast billing determinants prepared by the AESO

22. In past years, the AESO used forecasts that had been approved by its board for ancillary services, losses and own administrative costs for the forecast year; however, in order to facilitate a January 1, 2017, effective date, the AESO explained that it was proposing to use the AESO's 2016 forecast costs that were approved by the AESO board on December 16, 2015.²² A copy of that board decision document was provided as Appendix A²³ to the application. An amendment to increase the budget by \$1.5 million to reflect the AESO's climate change program was issued on February 18, 2016.²⁴

23. The methodology approved in Decision 2010-606 included a process to update maximum investment level (MIL) amounts approved in the most recent comprehensive tariff application by an escalation factor based on a composite of specified recent inflation indices. Accordingly, the AESO updated the composite inflation index used for developing the point of delivery cost function to 2017, using additional Statistics Canada cost index values and the most recent Conference Board of Canada forecast of the Alberta consumer price index. The AESO applied the resulting escalation factor to the 2014 Rate DTS MILs to determine the 2017 Rate DTS MILs, which resulted in a small increase to the 2017 MILs.²⁵

24. The AESO originally determined the TFOs' wires costs using the methodology described in Section 2.2.1 of the AESO's 2014 ISO tariff application and the 2013 ISO tariff update,²⁶ consistent with the methodology approved in Decision 2010-606, and referenced in Decision 2014-242.²⁷ Under this methodology, the forecast costs for wires were determined as follows:²⁸

(a) If a transmission facility owner has received final Commission approval for its applicable tariff, the AESO includes the approved cost for that transmission facility owner tariff.

(b) If a transmission facility owner has applied for its tariff, the Commission has issued an initial decision on the application, and the transmission facility owner has submitted a refiling in compliance with the decision, the AESO includes the transmission facility owner tariff costs included in the refiling.

¹⁹ Exhibit 22093-X0008, application, paragraph 54.

²⁰ Exhibit 22093-X0008, application, paragraph 55.

²¹ Decision 2013-421: Alberta Electric System Operator, 2014 ISO Tariff Application and 2013 ISO Tariff Update Negotiated Settlement – Cost Causation Study, Proceeding 2718, Application 1609765-1, November 27, 2013.

²² Exhibit 22093-X0008, application, paragraph 24.

²³ Exhibit 22093-X0001.

²⁴ Exhibit 22093-X0008, application, paragraph 25.

²⁵ Exhibit 22093-X0008, application, paragraphs 83-85.

²⁶ Proceeding 2718, Exhibit 0026.00.AESO-2718, Alberta Electric System Operator 2014 ISO Tariff Application and 2013 ISO Tariff Update, July 19, 2013, paragraphs 53-57.

²⁷ Decision 2014-242: Alberta Electric System Operator 2014 ISO Tariff Application and 2013 ISO Tariff Update, issued August 21, 2014, paragraph 43.

²⁸ Exhibit 22093-X0008, application, paragraph 29.

(c) If a transmission facility owner has applied for its tariff but the Commission has not yet issued an initial decision on the application or an initial decision has been issued but the transmission facility owner has not yet submitted its compliance refiling, the AESO includes the tariff costs most recently approved by the Commission on a final basis for the transmission facility owner plus 72% of any increase or decrease included in the transmission facility owner's tariff application above or below the prior approved costs.

(d) If a transmission facility owner has not yet applied for its tariff, the AESO includes the transmission facility owner tariff costs most recently approved by the Commission on either a final or interim basis. [footnotes removed]

25. However, as a result of the time lag experienced for TFOs to obtain approved tariffs, the AESO proposed a change to the methodology for the purposes of this update and future updates. The AESO proposed to use a TFO's last-approved tariff or its last applied-for costs in a compliance filing, plus 72 per cent of any increase or decrease included in a TFO's tariff application.²⁹

26. The AESO stated that continuing to use the method approved previously to calculate the updated wires costs creates a situation in which the 2017 forecast wires costs for AltaLink would decrease from the 2016 amount.³⁰ The AESO stated that wires costs have increased every year and that a decrease was not expected.³¹

27. The AESO argued that a TFO's compliance filing amount can be used as a substitute for an approved amount when a final decision has not been issued, but a compliance filing amount is not considered a substitute for the last-approved revenue requirement amount from which the increase/decrease in wires forecast costs are calculated. The AESO submitted that the proposal to use the compliance filing amounts is necessary because the expectation at the time the methodology was first put in place was that tariff approvals would not lag the AESO's tariff updates by more than a year.³² The AESO explained that the intent of annual tariff updates was to limit potential misallocations that might occur if cost imbalances were allocated through Rider C; therefore, the AESO considered that it was better to adjust the methodology in order to target a reasonably expected outcome, rather than an unusual one, to avoid inadvertently increasing the magnitude of cost imbalances.³³

28. The AESO proposed the following amendments to the base amount from which it calculates the wires forecast costs, as follows:³⁴

(c) If a transmission facility owner has applied for its tariff but the Commission has not yet issued an initial decision on the application or an initial decision has been issued but the transmission facility owner has not yet submitted its compliance refiling, the AESO includes the **most recent of the following: (i) the transmission facility owner** tariff costs ~~most recently~~ **last** approved by the Commission on a final basis for the transmission facility owner plus 72% of any increase or decrease included in the transmission facility owner's tariff application above or below the prior approved costs, **and (ii) the transmission facility owner tariff costs last applied-for by the transmission facility**

²⁹ Exhibit 22093-X0008, application, paragraphs 29-30.

³⁰ Exhibit 22093-X0008, application, paragraph 31.

³¹ Exhibit 22093-X0028, AESO-AUC-2016NOV22-002(a)(i).

³² Exhibit 22093-X0028, AESO-AUC-2016NOV22-002(a)(ii).

³³ Exhibit 22093-X0028, AESO-AUC-2016NOV22-002(a)(i).

³⁴ Exhibit 22093-X0008, application, paragraph 30.

owner in a compliance refiling plus 72% of any increase or decrease included in the transmission facility owner's tariff application above or below the prior approved costs.

(d) If a transmission facility owner has not yet applied for its tariff, the AESO includes the **most recent of the following: (i) the transmission facility owner tariff costs most recently last approved by the Commission on either a final or interim basis, and (ii) the transmission facility owner tariff costs last applied-for by the transmission facility owner in a compliance refiling.**

[Proposed revisions in bold and underlined]

29. The AESO submitted that the tariff updates proposed in the application were just and reasonable³⁵ and consisted of formulaic updates to the AESO's annual revenue requirement, based on the AESO's updated forecast costs for the 2017 rate, rider and MIL amounts using the rate calculation methodology already approved by the Commission in Decision 3473-D01-2015 (Errata), and the investment amounts approved in Decision 3473-D01-2015 (Errata) and updated in Decision 21302-D01-2016.³⁶

4 Commission findings

30. In Decision 2010-606, the Commission approved an approach that included filing comprehensive tariff applications every three years and, in conjunction with this, filing annual tariff updates. The Commission stated that it considered an annual revenue requirement and rate update may benefit customers by limiting potential misallocations that might occur if the AESO were to rely on Rider C exclusively to allocate periodic revenue and cost imbalances to its customers.³⁷

31. The scope of the annual tariff updates includes the following three components:³⁸

- an annual revenue requirement update using the approach to the wires cost forecast as described in section 2.2 of the Application, plus forecasts for ancillary services costs, losses costs and administration costs approved by the AESO Board for the forecast year;
- revised rate levels for each AESO rate calculated from the forecast revenue requirement and forecast billing determinants using rate calculations and rate design approved in the most recent comprehensive tariff application; and
- annual updates to investment amounts approved in the most recent comprehensive tariff reflecting an escalation factor based on the most recent Conference Board of Canada Alberta consumer price index (CPI).

32. The following two tables provide a comparison of the AESO's proposed method to calculate the wires forecast (Table 1) and the previously approved method of calculating the wires forecast (Table 2).

³⁵ Exhibit 22093-X0008, application, paragraph 9.

³⁶ Exhibit 22093-X0008, application, paragraph 6.

³⁷ Decision 2010-606, paragraph 547.

³⁸ Decision 2010-606, paragraph 537.

Table 1. Summary calculation of 2017 wires cost forecast using the AESO proposed method

TFO	Last-approved revenue requirement		2016 wires forecast	Latest TFO application	2017 TFO revenue requirement forecast		
	Amount (\$ million)	Year	Amount (\$ million)	Amount (\$ million)	Increase / (decrease) from 2016 wires forecast (\$ million)	72% of increase / decrease (\$ million)	Forecast revenue requirement (\$ million)
AltaLink	511.7	2014	822.3	886.5	64.3	46.3	868.6
ATCO Electric	567.2	2014	687.8	665.0	(0.2)	(0.2)	664.8
ENMAX	73.9	2015	73.9	73.9	N/A	N/A	73.9
EPCOR	98.6	2017	99.8	98.6	N/A	N/A	98.6
City of Lethbridge	6.1	2014	6.3	7.1	N/A	N/A	7.1
TransAlta Corporation	4.9	2014	4.9	4.9	N/A	N/A	4.9
City of Red Deer	4.3	2017	3.9	4.3	N/A	N/A	4.3
FortisAlberta	4.8	2016	4.8	4.7	(0.1)	(0.1)	4.7
Total							1,726.9

Source: Exhibit 22093-X0029, AESO-AUC-2016NOV22-001 Working File, AESO-AUC-2016 NOV22-001(c)

Table 2. Calculation of 2017 wires cost forecast using the previously approved method

TFO	Last-approved revenue requirement		Latest TFO application	2017 TFO revenue requirement forecast		
	Amount (\$ million)	Year	Amount (\$ million)	Increase / (decrease) from last-approved revenue requirement (\$ million)	72% of increase / decrease (\$ million)	Forecast revenue requirement (\$ million)
AltaLink	511.7	2014	886.5	374.9	269.9	781.6
ATCO Electric	567.2	2014	665.0	(0.2)	(0.2)	664.8
ENMAX	73.9	2015	73.9	N/A	N/A	73.9
EPCOR	98.6	2017	98.6	N/A	N/A	98.6
City of Lethbridge	6.1	2014	7.1	N/A	N/A	7.1
TransAlta Corporation	4.9	2014	4.9	N/A	N/A	4.9
City of Red Deer	4.3	2017	4.3	N/A	N/A	4.3
FortisAlberta	4.8	2016	4.7	(0.1)	(0.1)	4.7
Total						1,639.9

Source: Exhibit 22093-X0029, AESO-AUC-2016NOV22-001 Working File, AESO-AUC-2016 NOV22-001(d)

33. This comparison shows an increase of \$87 million to be collected by the AESO under its proposed change to the methodology.³⁹ The Commission also recognizes that extraordinary adjustments related to the refund of previously collected credit metric relief amounts, by AltaLink, has resulted in a reduction of \$133.7 million⁴⁰ to the 2014 last-approved revenue requirement amount.⁴¹ The AltaLink refund amount was added back to the approved revenue requirement amount in order to determine whether the decrease was related to the AltaLink refund. The calculation of what the 2017 wires forecast would be with this adjustment is shown in Table 3.

Table 3. Calculation of 2017 wires cost forecast using the previously approved method with the removal of the refund of previously collected credit metric relief amounts

TFO	Last-approved revenue requirement		Latest TFO application	2017 TFO revenue requirement forecast		
	Amount (\$ million)	Year	Amount (\$ million)	Increase / (decrease) from last approved revenue requirement (\$ million)	72% of increase / decrease (\$ million)	Forecast revenue requirement (\$ million)
AltaLink	645.4 ⁴²	2014	886.5	241.1	173.6	819.0

34. Table 3 demonstrates that, even without the extraordinary adjustment, the 2017 forecast revenue requirement for AltaLink would have been less than the 2016 wires forecast amount of \$822.3 million, as shown in Table 1. Consequently, the Commission finds that although the one-time refund represents a unique circumstance that may result in the updated wires forecast amount to be less than the prior years, it is not the sole reason for this result. Therefore, the Commission considers that the previously approved calculation methodology is inadequate to deal with multi-year lags between approved tariffs, and an amendment to this methodology is reasonable in order to handle these instances.

35. In response to the Commission's request to the AESO to calculate the effect on Rate DTS customers through Rider C, given an approval or rejection of the AESO's proposed change, the AESO provided the following:⁴³

- i. If the Commission approved the change to the calculation of forecasted wires costs, the Rider C would remain the same as the amount currently used for the Q1 Rider C amount, which is a credit of \$0.51/MWh [megawatt hour].
- ii. If the Commission approved the change to the calculation of forecasted wires costs, the Rider C results in lower forecast revenue while forecast costs remain the same for the Q1 [quarter one] Rider C amount, leading to a charge of \$0.94/MWh.

36. The AESO stated that its proposed change to calculating forecast wires costs reduces the magnitude of the Q1 Rider C amount in comparison to the previously approved approach.⁴⁴

³⁹ \$1726.9 million – \$1639.9 million = \$87 million.

⁴⁰ (\$109.3 million)+(\$14.6 million)+(\$5.0 million)+(\$6.8million)+\$2.0 million = (\$133.7 million).

⁴¹ Exhibit 22093-X0029, AESO-AUC-2016NOV22-001 Working File, AESO-AUC-2016 NOV22-001(a).

⁴² \$511.7 + \$133.7 = \$645.4 [Source: Exhibit 22093-X0029, AESO-AUC-2016NOV22-001 Working File, AESO-AUC-2016NOV22-001(a)].

⁴³ Exhibit 22093-X0052, letter responding to request for updated 2017 rate calculations.

Furthermore, the AESO argued that the proposed amendments align with the original intention of submitting an ISO tariff update application, which is to limit potential misallocations that might occur if the AESO were to rely on Rider C.

37. The Commission finds that the AESO's proposed changes to Section 2.2.1, parts (c) and (d) of the Commission's direction in Decision 2010-606, are reasonable and are approved as filed. The Commission further finds the AESO's \$1.5 million amendment to its 2016 board-approved administration costs forecast for 2017, related to the climate change program, to be reasonable.

38. The AESO's 2017 tariff update application, including the amounts set out in its Appendix C to the application⁴⁵ and the proposed 2017 ISO tariff Rate DTS, Rate FTS, Rate DOS, Rate XOS, Rate XOM, Rate PSC, Rate STS, Rider J and Section 8 set out in Appendix E⁴⁶ to its application, is approved.⁴⁷

5 Order

39. It is hereby ordered that:

- (1) The Alberta Electric System Operator's 2017 ISO tariff update application is approved, effective January 1, 2017.

Dated on April 4, 2017.

Alberta Utilities Commission

(original signed by)

Henry van Egteren
Commission Member

⁴⁴ Exhibit 22093-X0052, letter responding to request for updated 2017 rate calculations.

⁴⁵ Exhibit 22093-X0003, AESO 2017 ISO Tariff Update - Appendix C - Rate Calculations.

⁴⁶ Exhibit 22093-X0005, AESO 2017 ISO Tariff Update - Appendix E - 2017 ISO Tariff Rates, Rider J.

⁴⁷ Exhibit 22093-X0008, application, paragraph 87.

Appendix 1 – Proceeding participants

Name of organization (abbreviation) Company name of counsel or representative
Alberta Electric System Operator (AESO)
Dual Use Customers Desiderata Energy Consulting Inc.
Alberta Direct Connect Consumers Association
AltaLink Management Ltd.
ATCO Electric Ltd. Bennett Jones LLP
EPCOR Distribution & Transmission Inc.
Office of the Utilities Consumer Advocate (UCA)
Primary Services Group Regulatory Law Chambers

Alberta Utilities Commission
Commission panel H. van Egteren, Commission Member
Commission staff C. Wall (Commission counsel) C. Strasser S. Karim