



February 16, 2006

Sent via e-mail

AESO Stakeholders

AESO 2005-2006 General Tariff Application

Dear Stakeholder:

Re: **AESO 2007 Tariff — Stakeholder Comments on Study Terms of Reference**

On January 27, 2006, the AESO distributed and invited stakeholders to comment on terms of reference for two studies to be completed for the AESO's 2007 tariff application:

- a *2006 Cost Causation Study* to further improve the DTS rate design, and
- an investment level study to refine and improve the DTS investment policy.

Attached are matrices of the comments received from stakeholders, including responses by the AESO. We will revise the terms of reference based on these comments in the near future, and will proceed with the studies based on the schedule proposed in our correspondence of January 12, 2007. The comments and the final terms of reference will be posted on the AESO's website shortly.

In addition to these two studies, the AESO is proceeding with development of other aspects of its 2007 tariff, as outlined in discussion papers on December 13, 2005 and response matrices on January 12, 2006.

The AESO appreciates the feedback received from stakeholders. Preliminary results from the studies are expected near the end of March, and will be provided to stakeholders when they become available. At that time, we will also give consideration to whether further discussion or a meeting or workshop in regards to the preliminary results or other matters would provide additional value.

If you have any questions on the 2007 tariff consultation, please contact John Martin at (403) 539-2465 or Ed Hucman at (403) 539-2469 or by e-mail to john.martin@aeso.ca or ed.hucman@aeso.ca. All information on the 2007 tariff consultation is available on the AESO's website at www.aeso.ca by following the paths:

- Tariff ► Current Consultations ► 2007 Rates, and
- Tariff ► Current Consultations ► 2007 Terms and Conditions.

Sincerely,

[original signed by]

Heidi Kirrmaier
Vice President, Regulatory

2500, 330 - 5th Ave SW Calgary, Alberta T2P 0L4
t (403) 539-2450 | f (403) 539-2949 | www.aeso.ca

**AESO 2006 Cost Causation Study Terms of Reference
Stakeholder Comments and AESO Responses (Updated) — February 22, 2006**

AESO Proposal	Stakeholder Comment	AESO Response
1. Bulk System		
<p>Study all of the major bulk paths (between 20 and 30 paths) to determine the relationship between the time of maximum stress and the time of peak system load. This study component would primarily use technical data from the 500 kV N-S Need Application as the basis</p>	<p>ATCO Electric – Support</p> <p>CNRL – Support As was shown in the AESO Transmission Planning Presentations January 31st, 2006, the time of maximum stress and the time of peak system load are not well correlated. Considering the high load factors and the flat duration curves, the highest stress on the transmission paths in the North West and North East are driven by the outages of generators and transmission lines. The path can go from a low stress to a maximum stress period on one generator outage at any time. There can be high stress on any of the paths when there is little stress on the North South Path. This disconnect between high system stress, and peak system load will negatively influence the Tariff design as there is reduced cost causation and cost justification between the tariff cost drivers, system peak load and maximum stress on the transmission paths.</p> <p>The study may show this; more likely it will show that the North South path is more stressed by exports and by maintenance outages than by system peak load. It may also show that the other paths, North East, North West, South East and South West are stressed by other factors than system peak load. This appears in the AESO planning work and should be reflected in the AESO Tariff work.</p> <p>EnCana – Support EnCana agrees that the Cost Causation Study should examine all bulk paths. This work should begin by identifying the 20 or 30 “major” bulk paths used by the AESO transmission planners. (Minor bulk paths should also be defined and identified, if such exist.) The study should then seek to determine the load levels and patterns that are determinative to the expansion or upgrade of the bulk system.</p> <p>The AESO is currently in the process of completing regional transmission plans for the NE, NW, Edmonton, Calgary, and SE regions. These studies provide an up-to-date reflection of the factors that cause bulk system upgrades and expansions. Any examination of the bulk system should include a review of the critical drivers that are determinative to these need applications. In contrast, it is unclear how a review of the 500 kV Need Application will be of any assistance as none of the other bulk paths were subject to an upgrade or expansion.</p> <p>The bulk path load study should not focus strictly on a concept of “maximum</p>	<p>The recent planning studies will be utilized when examining the major bulk paths.</p> <p>Please see response to CNRL above. If system data from the 500 kV N-S Need Application does not allow adequate analysis of other major bulk paths, additional data from recent planning studies will be utilized.</p> <p>The AESO considers that maximum</p>

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	<p>stress” as a driver of system upgrades or expansions. For instance, some of the expansions proposed by the AESO in its regional studies are driven by cost avoidance (displacement of TMR, loss savings), reliability concerns associated with random stress conditions, and reliability concerns driven by generation development. These drivers should be recognized and classified.</p> <p>FIRM – Support FIRM supports this study in order to understand the relationship between cost drivers for the bulk system and peak system load, if any. If there are different cost drivers for different paths the AESO should consider rational cost recovery mechanisms that are reflective of bulk system cost causation overall and provide the right price signals.</p> <p>IPCAA – Indifferent Given the AESO acceptance of the 2006 tariff principles IPCAA understands that the conclusion of a review of all bulk paths could only result is a change in the demand/energy classification of bulk transmission costs. As there is no agreed basis for averaging the results over 20 to 30 paths it would not be unexpected that various weighting alternatives may produce a broad range of results. In the end, it is unlikely that greater precision will be achieved. In addition, there does not appear to be consensus as to whether (a) flows should be based on contingency conditions (conditions that may be viewed as more appropriate when contemplating causation rather than usage) and (b) whether opportunity transactions should be excluded from the flows analyzed.</p> <p>Kinder Morgan and Enbridge – Position not indicated</p>	<p>stress is still the most relevant driver for bulk path costs. Other factors like TMR and reliability concerns usually arise when a path cannot accommodate the maximum stress placed on it. Loss savings were included in the initial cost study and are expected to continue to be considered in the 2006 study.</p> <p>In Direction 4C of Decision 2005-096 the EUB “expects that...the AESO will conduct a more thorough review of all those lines comprising the bulk system” to indicate “the exact portion of costs that are energy related.” (p. 23) The AESO therefore will address this in the <i>2006 Cost Causation Study</i>, with the primary outcome a determination of the demand-energy classification (as IPCAA notes).</p>
2. Interties		
<p>Review the treatment of intertie facilities (the Alberta-BC and Alberta-Saskatchewan interconnections) in the <i>2006 Cost Causation Study</i>, including the context of this treatment under current legislation and regulation. If appropriate, study and recommend a means to separate the costs of intertie facilities from domestic facilities within Alberta. This study component would utilize the</p>	<p>ATCO Electric – Support</p> <p>CNRL – Indifferent</p> <p>EnCana – Position not indicated Not a priority issue. Should be postponed given short timeframe and other priorities.</p> <p>FIRM – Support FIRM supports the study with the expectation it would shed light on costs associated with imports and exports.</p> <p>IPCAA – Indifferent It is not clear what the benefit of separately identifying the cost of intertie</p>	<p>The AESO agrees that this component of the study is a lower priority than other components, but suggests the additional understanding would be useful in the development of 2007 export and import rates.</p> <p>The AESO plans to consider including</p>

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2003 cost data used in the original study	<p>facilities would be. As there are no firm imports or exports the cost of such facilities could not be recovered from such transactions in any event.</p> <p>If the question is whether it is appropriate to recover the costs of intertie facilities on a CP basis, as bulk transmission is, then this work will only answer a portion of the question.</p> <p>Kinder Morgan and Enbridge – Position not indicated</p>	non-recallable (“firm”) export and import rates in its 2007 GTA, and therefore understanding intertie costs may be of value in support of the development of such rates.
3. Local System and POD		
<p>Study and recommend a means to better differentiate between the Local System and POD functions. Ensure definitions align with usage elsewhere in the AESO tariff (specifically, within the terms and conditions of service). This study component would utilize the 2003 cost data used in the original study.</p>	<p>ATCO Electric – Support</p> <p>CNRL – Support The definitions and the cost split between Local System and Point of Delivery are unclear, an alignment and review are appropriate to consider the cost drivers and cost splits in the tariff.</p> <p>EnCana – Support EnCana agrees that the study should include a clear definition for “POD” and “Local” functions so they can be used consistently throughout the tariff. Given a clear distinction, the study should re-examine the functionalization of costs using, as a minimum, the 2003 data and should include more recent data. The definition of the “Local” function should also include a clear distinction between “Local” and “Bulk” functions. The concern is not so much with the definition (as established in the TCCS) but with the inconsistency between the definition and the functionalization of costs. For instance, the methods used in the TCCS (voltage, economics, volume-distance) segregated 138 kV facilities into the classification of “Local” function. This may be appropriate on a go-forward basis, but contradicts the historical usage of such facilities to transfer bulk power of large geographic distances (e.g. NW, East-Central, SE). A review of the functionalization of wires costs into the “local” function should follow logically from the definition of bulk paths as determine in activity #1.</p> <p>FIRM – Support FIRM supports this analysis especially to align with usage of these terms in the T&Cs. This would also provide a more homogeneous data set for use in analysing fixed and variable components of POD costs. If there are significant differences between local systems and PODs serving Discos and those serving industrial and other customers, these differences should be identified and an assessment made as to whether separate rate classes are required or a different tariff structure is required. Example, if the local systems for industrial customers are systematically longer than those of Discos there may be justification for a MW-mile based tariff for local systems.</p>	<p>The differentiation between bulk system and local system will be reviewed as part of the <i>2006 Cost Causation Study</i>.</p> <p>The AESO does not expect to propose different industrial and DISCO rates for 2007. If cost differences are found, the AESO will consider new rate classes to reflect them in a later tariff application, after additional stakeholder</p>

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	<p>IPCAA – Indifferent The approved tariff recovers local and POD demand charges on the same basis so it is not clear to IPCAA what the outcome of this review would practically be. A shift in demand costs from local to POD would have no impact on the tariff.</p> <p>Kinder Morgan and Enbridge – Position not indicated</p>	<p>consultation.</p> <p>IPCAA comments on item 6 below that costs and investment should be aligned. The AESO invests only in POD facilities, so the costs of POD facilities should be correctly identified. As well, since POD costs may be affected by contributions (item 5) and customer ownership of facilities (item 6), they should be determined accurately to ensure the correct starting point.</p>
4. POD		
<p>Study POD costs in more detail, including more detailed analysis of POD cost components, how POD costs vary with load size, and whether such variation is linear or follows some other pattern. This study component would utilize the 2003 cost data used in the original study. As well, this study component would be coordinated with, and potentially use additional detailed data from, the investment level study being conducted as part of the AESO's 2007 terms and conditions consultation.</p>	<p>ATCO Electric – Support</p> <p>CNRL – Support Point of Delivery costs are not linear with load size. There are set and standard (lumpy) transformer sizes plus many common elements such as control buildings, telecommunications, station services and circuit breakers that are required for even a minimal substation with minimal load. The challenge will be to separate out and identify the many common elements, as opposed to the load specific elements. The load serving distribution circuit breakers are also lumpy cost additions that are not linear with load additions. The other challenge will be to separate out the elements that are load specific verses legacy system decisions, voltage levels differences, historical practice, future equipment provisions and the reliability difference between historical TFO practices and the present AESO practices.</p> <p>EnCana – Support EnCana agrees that there is a need to study POD costs and the drivers to such costs. To do so, the AESO needs to examine a “representative sample” of PODs and for each of these develop a clear understanding of factors that create costs. Such an approach should account for POD design and charges at the time of commissioning as compared to the current day standards and practices. The 2003 data set will not provide adequate information to delineate the cost drivers, the additional data from the 2007 terms and conditions study should be included.</p> <p>FIRM – Support This analysis is necessary to reassess the structure and level of tariffs for</p>	<p>Most parties support the proposal to study POD costs in more detail, and the AESO will proceed as outlined.</p>

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	<p>recovery of POD costs. It is also necessary to align tariffs with investment policy.</p> <p>IPCAA – Oppose If this study merely reviews the embedded cost of existing substations then the variation in inflation effects will likely render the results meaningless. This will be especially true if depreciated costs are reviewed.</p> <p>Kinder Morgan and Enbridge – Position not indicated</p>	<p>The study will use both embedded cost data from the original cost causation study and data for recent projects from the customer contribution policy study being conducted as part of the AESO's 2007 tariff consultation. Use of recent project data should address concerns with inflation effects and depreciation.</p>
5. Contributions		
<p>Enhance the <i>2006 Cost Causation Study</i> by more precisely including the effect of contributions in aid of construction. Study the alignment of contributions with bulk system, local system, and POD functions, and develop a methodology to align and correlate contributions with facilities. This study component would primarily utilize the 2003 cost data used in the original study.</p>	<p>ATCO Electric – Support</p> <p>CNRL – Support If, as the AESO has contended, the second transformer and second line have historically been optional facilities paid for by the customer, then the effect of customer contributions to the development of the transmission system definitely needs to be studied. The effect though, is not likely clear; more that 20% of the facilities have two transformers, and historically only 20% of the projects have paid contributions. Again the challenge will be to separate the effect out of the averaging of the TFO Cost Accounts.</p> <p>EnCana – Support EnCana agrees that any assessment of transmission wire costs should be adjusted to remove the effects of contributions. EnCana is concerned that the 2003 data set will be inadequate for this purpose.</p> <p>FIRM – Support Linking contributions with the assets would enhance the accuracy of the COSS.</p>	<p>The AESO does not contend that a second transformer has traditionally been considered optional. Good transmission practice frequently leads to a second transformer being considered standard facilities and eligible for investment. About 25% of existing load substations have more than one transformer, and fewer than 10% of load substations incurred contributions (whether for standard facilities in excess of maximum investment levels, or for optional facilities). However, the AESO considers it important to properly correlate contributions with facilities to improve this aspect of the cost study.</p> <p>The AESO will use contributions that correspond to the cost data used when studying POD costs (as proposed in item 4).</p>

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	<p>IPCAA – Indifferent Given the apparent state of TFO records (as commented on in the last TCCS), the load related contributions are not likely to be available on a facility by facility basis. At the genco level this analysis would appear to mimic the proposed tasks to break out intertie costs and assess whether they should be recovered in the same manner as other bulk system costs (based on IPCAA’s understanding that genco interconnection costs were considered bulk costs in the last TCCS).</p> <p>Kinder Morgan and Enbridge – Position not indicated</p>	<p>The AESO believes that a meaningful number of TFO contributions can be attributed to specific POD facilities. The AESO also considers it important to identify, where possible, load-related and generator-related contributions, where both may have been paid at dual use substations.</p>
6. Dual-Use Substations		
<p>Review costs associated with transmission service at dual-use substations in the context of the AESO’s 2006 rate structure (including the use of substation fractions). For each of the 18 dual-use substations (excluding Fort Nelson) identified in section 4.10 of the AESO’s 2006 GTA, assess the costs, revenues, ownership, contributions, contract levels (DTS and STS), and any other relevant factors affecting the incurring and recovery of costs by the AESO. Propose a mechanism to fairly recover costs at dual-use substations.</p>	<p>ATCO Electric – Support</p> <p>CNRL – Oppose There was much evidence filed, disputed, and arguments argued over several AESO Test Years on the DTS Ratio and the COS Credit. There is little reason to reopen a concluded discussion.</p> <p>EnCana – Oppose EnCana opposes re-opening the dual-use cost allocation debate. The 2007 GTA work should focus on the analysis of POD costs and their relationship to customer size and characteristics.</p> <p>FIRM – Support This has been a contentious issue in the past. Alternative approaches to determination of cost causation and costs at dual use sites (load first, supply first) should be considered.</p> <p>IPCAA – Support IPCAA supports this initiative because it directly aligns with the position we took in 2006: revenues, costs and investment should all be aligned. IPCAA assumes that “other relevant factors” includes credit for customer-owned facilities.</p> <p>Kinder Morgan and Enbridge – Position not indicated</p>	<p>The AESO agrees that the past COS Credits and current Primary Service Credit (PSC) should not be reopened for examination. However, the AESO considers that there may be misalignment between the POD charge in the DTS rate and the PSC, especially if the DTS rate is refined to better account for customer ownership of or contribution to the substation. It may be possible to eliminate the PSC as a distinct rate if the POD charge itself can address the costs currently credited in the PSC. The PSC therefore needs to be examined in the context of the resulting POD charge proposal.</p>
7. Operations, Maintenance, and Administration		
<p>Enhance the <i>2006 Cost Causation Study</i> by studying operations, maintenance, and administration costs and</p>	<p>ATCO Electric – Support</p> <p>CNRL – Oppose The TFO O&M costs are driven by past decisions on location, equipment</p>	<p>In Direction 4D of Decision 2005-096</p>

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<p>causation relationships. If appropriate, use the results of the study for classification of such TFO costs rather than the current method of using the transmission property classification. This study component would primarily use additional information from TFO tariff applications.</p>	<p>choices, and driven by what it takes today to operate and maintain equipment and facilities that are virtually new to more than 50 years old. The only options are to carry on maintaining it to manufacturer's recommendations, maintaining it with a condition based maintenance system or cut maintenance and hope nothing bad happens. As experience has shown the latter leads to blackouts. The TFOs have reasonable O&M programs so there is little value in studying the O&M programs impact of the AESO Tariff...</p> <p>EnCana – Support EnCana supports the study of O&M, G&A and other costs not directly proportional to rate-base. The purpose of such work should focus the classification (i.e. demand-, energy-, customer-related) of the TFO costs as directed by the Board. A direct review of TFO applications is likely insufficient to provide a full understanding of the drivers to O&M and non-rate base costs. EnCana suggests that direct review and communication with each TFOs should be a part of the cost determination analysis.</p> <p>FIRM – Support This will improve the accuracy of the COSS. Consideration should be given to reflecting the impact of vintage on O&M costs.</p> <p>IPCAA – Indifferent It is IPCAA's experience that the TFO applications will be of no assistance in this task. Unless the AESO proposes acquiring information directly from the TFOs it is unlikely anything meaningful will come from this task.</p> <p>Kinder Morgan and Enbridge – Position not indicated</p>	<p>the EUB directed the AESO to address whether "a reasonable portion of TFO costs are related to O&M and...may be energy related...in future cost of service studies." (p. 23) The AESO therefore proposed to address this in the <i>2006 Cost Causation Study</i>. The AESO does not expect to study the impact of TFO O&M programs on the AESO tariff, but rather to determine whether TFO O&M costs should be functionalized and classified exactly the same as TFO capital-related costs (as done in 2006) or in some different manner. As EnCana states, the work would focus on whether such costs should be classified as demand-, energy-, or customer-related.</p> <p>Assessing how operations, maintenance, and administration costs should be classified will rely on additional sources of information, but the actual amount of such costs would come from the TFO tariff applications.</p>
8. Recommended Additional Activities		
<p>Include recommendations for future enhancements of the <i>2006 Cost Causation Study</i>, based on review of the comments made by stakeholders in the AESO's 2005-2006 GTA proceeding, on input from stakeholders during the 2007 rate consultation, and on results of the activities listed above. Future enhancements</p>	<p>ATCO Electric – Support</p> <p>CNRL – Oppose As has been argued many a time prior, DTS customers generally do not have a choice, can not relocate to avoid costs and according to the AESO have been paying for all of the optional facilities to provide for their own reliability. Even the transmission regulations recognize that a doubling of DTS Charges is not likely to lead to the loss of, or a change in, DTS customer load demand. There is no value in assessing whether customers were responding to the price signals given the DTS Rate. The challenge is that transmission assets are not all that comparable. The</p>	<p>The AESO's proposal is to lay out a plan for future activities so that stakeholders know what additional cost causation work will be completed in the future and an approximate timeframe when such work will be completed. If, as CNRL suggests, transmission customers do not respond to AESO tariff price signals, then there may be little value in attempting to provide a better signal than, for example, the</p>

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<p>may include:</p> <ul style="list-style-type: none"> assessing whether customers were responding to the price signals given by the DTS rate, and, if so, how and in what manner those responses were affecting transmission system planning, and differentiating depreciation and return by vintage of assets (also referred to as "normalizing" data for vintage). <p>Propose a schedule for addressing these recommendations for future enhancements.</p>	<p>transmission assets have seen multiple modifications, expansions and removals over the years, and often with relocated older assets so determining the vintage is almost impossible. With the TFO record keeping, the capital value of the facilities is known but what makes up the cost account is not likely traceable.</p> <p>EnCana – Position not indicated</p> <p>FIRM – Support</p> <ul style="list-style-type: none"> This activity should complement the bulk system cost causation and cost recovery referred to in 1 above. This would enhance the accuracy of the COSS given that POD assets tend to be of more recent vintage compared with bulk system assets. It is also consistent with the Board's view that vintages should be reflected in cost of service studies. <p>IPCAA – Indifferent</p> <p>Kinder Morgan and Enbridge – Position not indicated</p>	<p>coincident peak demand charge for the bulk system.</p> <p>The AESO suggests that the first step in determining future activities is assessing what aspects are worth studying, and what priority should be given such study. The AESO considers it would be useful to stakeholders to understand this, and plans to provide such recommendations for future enhancements.</p>
Schedule		
<p>The <i>2006 Cost Causation Study</i> activities will be conducted from February to April of 2006. A status report included preliminary results (where available) will be provided at the end of March, and final results at the end of April. Stakeholders will be invited to comment on the preliminary and final results, and responses to stakeholder comments will be incorporated into the final report for the study, where appropriate.</p>	<p>ATCO Electric – Support</p> <p>CNRL – Support</p> <p>EnCana – Position not indicated</p> <p>EPCOR – Position not indicated</p> <p>With respect to the revised schedule for filing the AESO 2007 General Tariff Application, EPCOR agrees with the AESO's proposal for additional time and views the suggested timelines as more realistic given the impact of the matters being addressed.</p> <p>FIRM – Support</p> <p>IPCAA – Support</p> <p>Kinder Morgan and Enbridge – Position not indicated</p>	<p>Parties generally support the proposed schedule for the <i>2006 Cost Causation Study</i>, and the AESO will proceed as outlined.</p>
Additional Comments		
	<p>ATCO Electric – ATCO Electric supports the AESO's proposal to delay the filing of 2007 AESO GTA to May-June time frame to perform a new transmission cost causation study. ATCO Electric expects that the results of this study would</p>	

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	<p>alleviate some of the concerns raised in regards to the 2005-2006 GTA Decisions.</p> <p>CNRL – One recommendation is for the AESO Tariff people to discuss the relationship between the time of maximum stress and the time of peak system load with the AESO Planning people, particularly with respect to the North West, the North East and the South West.</p> <p>EnCana – Following the posting of the AESO’s response matrix (Feb 15), the AESO should set a meeting to discuss the AESO’s final approach including more discussion of the specifics on the scope of work to be done. This will ensure there is a better understanding by all participants of the work being undertaken. This discussion should occur no later than the end of February. A workshop to discuss the preliminary results should be held at the end of March. This would provide stakeholders the opportunity to provide additional input and feedback prior to the conclusion of the study.</p> <p>EPCOR – EPCOR remains unconvinced of the merits of the single coincident peak as a measure of transmission cost causation, and does not believe that “the practical and administrative concerns of billing on coincident demand have been addressed for 2006”. EPCOR continues to hold the views expressed in its December 20, 2005 letter to the AESO regarding single coincident peak billing for bulk system demand. Further, EPCOR requests that the AESO take the time to consider more appropriate and practical billing determinants for its 2007 application.</p> <p>Kinder Morgan and Enbridge – Kinder Morgan Canada Inc. and Enbridge Inc. endorse the detailed cost study proposed by the AESO and encourage a high level of detail to allow for a more complete analysis. This will result in less analysis work being required of intervening parties. We anticipate and that the new data will provide a clear description of methodology and meaningful statistical analysis. Our primary concern is that the supporting data to the POD charge be statistically relevant.</p>	<p>Discussions will be held with AESO System Planning as part of preparing the <i>2006 Cost Causation Study</i>, as was also done for the initial study.</p> <p>The AESO considers this written comment process has provided adequate opportunity for stakeholder input on the study terms of reference, and that the AESO has received sufficient feedback to proceed. However, stakeholders may provide additional comments at any time. When the preliminary results of the study are provided, the AESO will assess whether a meeting or workshop would provide further value.</p> <p>At this time the AESO considers individual monthly coincident peak billing to be appropriate and practical, given the context of Decision 2005-096 and other rate design issues. The AESO will re-assess any potential concerns with coincident peak billing after experience is gained for at least one settlement period (that is, after January 2006 final settlement in September 2006). Therefore no changes will be proposed in the AESO’s 2007 tariff application expected to be filed in May-June 2006.</p>