

**AESO 2007 Terms and Conditions Consultation  
September 21, 2006 Presentation — Stakeholder Comments**

Revised October 18, 2006

Written comments were provided by:

- ADC
- ATCO Electric
- EnCana
- EPCOR
- FortisAlberta
- IPCAA
- PPGA
- TransCanada Energy

**AESO 2007 Terms and Conditions Consultation  
September 21, 2006 Stakeholder Presentation — Stakeholder Comment Form**

Comments From: Alberta Direct Connect Consumers Association (ADC)  
 Date: October 11, 2006  
 Contact: Colette Kearn/Carrie Haines  
 Phone: (780) 920-9399/ (403) 770-1164  
 E-mail: [Colette@valeopower.com](mailto:Colette@valeopower.com)/ [Carrrie@valeopower.com](mailto:Carrrie@valeopower.com)

On September 21, 2006, the AESO presented a current draft of terms and conditions proposals to be included in its 2007 tariff application. The presentation focussed on matters which had changed significantly since the previous presentation on June 29, 2006. The AESO invites stakeholders to provide comments on the proposals presented on September 21, using the following comment form.

<b>Article 1 – Definitions &amp; Interpretation</b>	
1. Addition of new defined term Substation Fraction	<input type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
Reasons for Stakeholder Position:	
2. Revised document references regarding Interconnection Requirements	<input type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
Reasons for Stakeholder Position:	
3. Replaced “RMS” / “Reliability Management System” with Reliability Standards and updated definition	<input type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
Reasons for Stakeholder Position:	

<b>Article 9 – Prepaid O&amp;M</b>	
4. Propose to remove the O&M charge on AESO Standard Facilities	<input type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
Reasons for Stakeholder Position:	

<b>Article 9 – Maximum Investment Function</b>	
5. The proposed cost function design considers a two part approach, where the minimum cost function is used to determine the minimum fixed cost for any project and average cost function	<input type="checkbox"/> Support <input type="checkbox"/> Oppose

<p>for projects beyond the average DTS capacity of 17 MW.</p> <p>Proposed cost function:  \$2.296m  +(\$0.279m/MW x first 17 MW of DTS capacity)  +(\$0.154m/MW x DTS Capacity above 17 MW)</p>	<input type="checkbox"/> Indifferent
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Reasons for Stakeholder Position:

<p>6. Although there were concerns regarding the data sample i.e. statistical validity, data sample representation, data scatter around average cost function and concern that higher costs may be attributed to smaller customers than what is actually incurred, utilizing the minimum cost function in cooperation with the average cost function is a reasonable approach.</p>	<input type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
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Reasons for Stakeholder Position:

<p>7. As per Directive 13a part 3 a multiplier was used to determined the proposed investment function:</p> <p>Proposed investment function:  \$2.985m  +(\$0.363m/MW x first 17 MW of DTS capacity)  +(\$0.200m/MW x DTS Capacity above 17 MW)</p>	<input type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
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Reasons for Stakeholder Position:

<p>8. The AESO has sufficiently complied with Direction 13A of EUB Decision 2005-096, and was able to effectively address the following through the course of the Customer Contribution Study:</p> <ol style="list-style-type: none"> <li>1. <i>Incorporate a sufficient number and diversity of data points</i></li> <li>2. <i>Determine the Raw Interconnection Project Cost Function</i></li> <li>3. <i>Determine an appropriate multiplier such that 80% of projects do not pay a contribution.</i></li> </ol>	<input type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
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Reasons for Stakeholder Position:

**Article 9 – Contract Capacity Increases**

<p>9. For contract capacity increases requiring the construction of new transmission facilities, the approved tariff at the time customer demonstrates sufficient commitment as per the AESO's business practices will be applied to the project.</p>	<input type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
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Reasons for Stakeholder Position:

10. For contract capacity changes along with the other events outlined in Articles 9.9 & 9.10, customer contributions will be recalculated based upon the tariff used in the original calculation.

Support  
 Oppose  
 Indifferent

Reasons for Stakeholder Position:

**Article 14 – Reductions or Termination of Contract Capacity**

11. Contract capacity reduction or termination buy out calculations will only include the System Charge as contained in the DTS rate schedule.

Support  
 Oppose  
 Indifferent

**Partially Agree**

Reasons for Stakeholder Position:

- The ADC is supportive of the move towards the use of only the system charge for termination calculations.
- The five year notice period should not be linked to planning decisions by the AESO. The ADC submits that a termination should be treated in similar respect as Contract Capacity Increases, where a five year notice period is not required. In most respects, a customer will not be able to forecast when their facility will no longer be required or is forced to shut down due to economic circumstances. The 5 year notice period provides an incentive for customers to give notice even if they do not intend to leave in 5 years just to avoid the penalty exposure if their business circumstances were to change. This is detrimental to system planning.
- If a customer chooses to terminate transmission service at a time where the bulk system is stressed, the exit penalties are counter-intuitive and extremely punitive. If the capacity is needed because of local and provincial load growth, the AESO should be willing to make an exit fee assessment on a case by case basis.
- It is our understanding that if a payment in lieu of notice were received by the AESO and after receipt of payment, another customer were to utilize the same local and bulk facilities as the leaving customer, there is no refund of payment to the leaving customer. This creates the possibility of the AESO recovering twice the payment for use of facilities. The AESO should refund an appropriate portion of the payment to the leaving customer, provided the customer was still in business. If there is no possibility of a refund, why would anyone want to make a payment in lieu of notice?
- The ADC would like to recommend that the AESO perform an assessment of total costs paid over the life of service for a customer that chooses to terminate electrical service. If it is found that the customer will not be leaving stranded investment, there should be little or no penalty assessed to that customer.

**Other**

12. Article 6 – Security & Customer Agreements  
 For facilities in excess of AESO Standard Facilities, distribution companies must provide security

Support  
 Oppose  
 Indifferent

Reasons for Stakeholder Position:

13. Article 17 – Service Interruptions & Force Majeure Language revised to note that other events other than the events provided may cause a service interruption	<input type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
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Reasons for Stakeholder Position:

14. Article 21 – Miscellaneous Notices are expanded to include emails as an acceptable form of notification	<input type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
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Reasons for Stakeholder Position:

<b>Additional Comments</b>

Please return this form with your comments by October 10, 2006, to:

Ed Hucman  
Manager, Regulatory  
E-mail: [ed.hucman@aeso.ca](mailto:ed.hucman@aeso.ca)  
Phone: (403) 539-2469  
Fax: (403) 539-2524

Lee Ann Leduc  
Senior Regulatory Analyst  
E-mail: [leeann.leduc@aeso.ca](mailto:leeann.leduc@aeso.ca)  
Phone: (403) 539-2741  
Fax: (403) 539-2524

**AESO 2007 Terms and Conditions Consultation  
September 21, 2006 Stakeholder Presentation — Stakeholder Comment Form**

Comments From: ATCO Electric  
 Date: October 10, 2006  
 Contact: Satar Parhar  
 Phone: 780-420-5501  
 E-mail: satar.parhar@atcoelectric.com

On September 21, 2006, the AESO presented a current draft of terms and conditions proposals to be included in its 2007 tariff application. The presentation focussed on matters which had changed significantly since the previous presentation on June 29, 2006. The AESO invites stakeholders to provide comments on the proposals presented on September 21, using the following comment form.

<b>Article 1 – Definitions &amp; Interpretation</b>	
1. Addition of new defined term Substation Fraction	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
Reasons for Stakeholder Position:	
2. Revised document references regarding Interconnection Requirements	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
Reasons for Stakeholder Position:	
3. Replaced “RMS” / “Reliability Management System” with Reliability Standards and updated definition	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
Reasons for Stakeholder Position:	

<b>Article 9 – Prepaid O&amp;M</b>	
4. Propose to remove the O&M charge on AESO Standard Facilities	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
Reasons for Stakeholder Position:	
ATCO Electric agrees with this proposal. If these O&M charges are not removed, then the proposed AESO investment function would require an upward adjustment to ensure that 80% of the projects do not require customer contribution.	

**Article 9 – Maximum Investment Function**

5. The proposed cost function design considers a two part approach, where the minimum cost function is used to determine the minimum fixed cost for any project and average cost function for projects beyond the average DTS capacity of 17 MW.

X Support  
 Oppose  
 Indifferent

Proposed cost function:  
\$2.296m  
+(\$0.279m/MW x first 17 MW of DTS capacity)  
+(\$0.154m/MW x DTS Capacity above 17 MW)

Reasons for Stakeholder Position:

6. Although there were concerns regarding the data sample i.e. statistical validity, data sample representation, data scatter around average cost function and concern that higher costs may be attributed to smaller customers than what is actually incurred, utilizing the minimum cost function in cooperation with the average cost function is a reasonable approach.

X Support  
 Oppose  
 Indifferent

Reasons for Stakeholder Position:

7. As per Directive 13a part 3 a multiplier was used to determined the proposed investment function:

X Support  
 Oppose  
 Indifferent

Proposed investment function:  
\$2.985m  
+(\$0.363m/MW x first 17 MW of DTS capacity)  
+(\$0.200m/MW x DTS Capacity above 17 MW)

Reasons for Stakeholder Position:  
We believe that the resulting AESO investment levels from the proposed formula appear to be reasonable and would mitigate the intergenerational inequity in the current investment levels. There is a need to have some mechanism to adjust this formula to account for a significant cost escalation anticipated for the new projects over the next few years.

8. The AESO has sufficiently complied with Direction 13A of EUB Decision 2005-096, and was able to effectively address the following through the course of the Customer Contribution Study:

X Support  
 Oppose  
 Indifferent

1. *Incorporate a sufficient number and diversity of data points*
2. *Determine the Raw Interconnection Project Cost Function*
3. *Determine an appropriate multiplier such that 80% of projects do not pay a contribution.*

Reasons for Stakeholder Position:

**Article 9 – Contract Capacity Increases**

9. For contract capacity increases requiring the construction of new transmission facilities, the approved tariff at the time customer demonstrates sufficient commitment as per the AESO's business practices will be applied to the project.
- X Support  
 Oppose  
 Indifferent

Reasons for Stakeholder Position:

10. For contract capacity changes along with the other events outlined in Articles 9.9 & 9.10, customer contributions will be recalculated based upon the tariff used in the original calculation.
- X Support  
 Oppose  
 Indifferent

Reasons for Stakeholder Position:

**Article 14 – Reductions or Termination of Contract Capacity**

11. Contract capacity reduction or termination buy out calculations will only include the System Charge as contained in the DTS rate schedule.
- X Support  
 Oppose  
 Indifferent

Reasons for Stakeholder Position:

**Other**

12. Article 6 – Security & Customer Agreements  
For facilities in excess of AESO Standard Facilities, distribution companies must provide security
- Support  
 Oppose  
 Indifferent

Reasons for Stakeholder Position:

13. Article 17 – Service Interruptions & Force Majeure  
Language revised to note that other events other than the events provided may cause a service interruption
- X Support  
 Oppose  
 Indifferent

Reasons for Stakeholder Position:

14. Article 21 – Miscellaneous  
Notices are expanded to include emails as an acceptable form of notification
- X Support  
 Oppose  
 Indifferent

Reasons for Stakeholder Position:

**Additional Comments**

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Please return this form with your comments by October 10, 2006, to:

Ed Hucman

Manager, Regulatory

E-mail: [ed.hucman@ieso.ca](mailto:ed.hucman@ieso.ca)

Phone: (403) 539-2469  
Fax: (403) 539-2524

Lee Ann Leduc  
Senior Regulatory Analyst  
E-mail: [leeann.leduc@aeso.ca](mailto:leeann.leduc@aeso.ca)  
Phone: (403) 539-2741  
Fax: (403) 539-2524

**AESO 2007 Terms and Conditions Consultation  
September 21, 2006 Stakeholder Presentation — Stakeholder Comment Form**

Comments From: EnCana Corporation  
 Date: October 10, 2006  
 Contact: Rod Crockford, Rinde Powell, Roger Belland  
 Phone: 403-645-7871, 403-645-6688, 780-486-4309  
 E-mail:

On September 21, 2006, the AESO presented a current draft of terms and conditions proposals to be included in its 2007 tariff application. The presentation focussed on matters which had changed significantly since the previous presentation on June 29, 2006. The AESO invites stakeholders to provide comments on the proposals presented on September 21, using the following comment form.

<b>Article 1 – Definitions &amp; Interpretation</b>	
1. Addition of new defined term Substation Fraction	<input type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
Reasons for Stakeholder Position:	
2. Revised document references regarding Interconnection Requirements	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
Reasons for Stakeholder Position:	
EnCana appreciates the clarification gained by identifying each of the technical requirements required for the interconnection of Customers. EnCana requests that the AESO clarify what process will be used to either (a) amend an existing technical requirement or (b) supplement or add additional technical requirements. Specifically, EnCana requests clarification as to how stakeholder will be made aware of the proposed changes and how stakeholders will be given a fair opportunity to comment on the changes.	
3. Replaced “RMS” / “Reliability Management System” with Reliability Standards and updated definition	<input type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
Reasons for Stakeholder Position:	

<b>Article 9 – Prepaid O&amp;M</b>	
4. Propose to remove the O&M charge on AESO Standard Facilities	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
Reasons for Stakeholder Position:	

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**Article 9 – Maximum Investment Function**

5.	The proposed cost function design considers a two part approach, where the minimum cost function is used to determine the minimum fixed cost for any project and average cost function for projects beyond the average DTS capacity of 17 MW.  Proposed cost function: \$2.296m +(\$0.279m/MW x first 17 MW of DTS capacity) +(\$0.154m/MW x DTS Capacity above 17 MW)	<input type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
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Reasons for Stakeholder Position:
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6.	Although there were concerns regarding the data sample i.e. statistical validity, data sample representation, data scatter around average cost function and concern that higher costs may be attributed to smaller customers than what is actually incurred, utilizing the minimum cost function in cooperation with the average cost function is a reasonable approach.	<input type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
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Reasons for Stakeholder Position:
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7.	As per Directive 13a part 3 a multiplier was used to determined the proposed investment function:  Proposed investment function: \$2.985m +(\$0.363m/MW x first 17 MW of DTS capacity) +(\$0.200m/MW x DTS Capacity above 17 MW)	<input type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
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Reasons for Stakeholder Position:
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8.	The AESO has sufficiently complied with Direction 13A of EUB Decision 2005-096, and was able to effectively address the following through the course of the Customer Contribution Study: <i>1. Incorporate a sufficient number and diversity of data points</i> <i>2. Determine the Raw Interconnection Project Cost Function</i> <i>3. Determine an appropriate multiplier such that 80% of projects do not pay a contribution.</i>	<input type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
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Reasons for Stakeholder Position:
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**Article 9 – Contract Capacity Increases**

9. For contract capacity increases requiring the construction of new transmission facilities, the approved tariff at the time customer demonstrates sufficient commitment as per the AESO's business practices will be applied to the project.  Support  
 Oppose  
 Indifferent

Reasons for Stakeholder Position:

The terms and conditions needs to address the consequences to the original customer when a new customer (with costs) is interconnected.

10. For contract capacity changes along with the other events outlined in Articles 9.9 & 9.10, customer contributions will be recalculated based upon the tariff used in the original calculation.  Support  
 Oppose  
 Indifferent

Reasons for Stakeholder Position:

**Article 14 – Reductions or Termination of Contract Capacity**

11. Contract capacity reduction or termination buy out calculations will only include the System Charge as contained in the DTS rate schedule.  Support  
 Oppose  
 Indifferent

Reasons for Stakeholder Position:

The AESO's description of its proposal is somewhat misleading. EnCana understands that the AESO's proposal is to calculate the buy-out amounts based on both the system charge and the POD charge, but that the System charge will be calculated as part of Article 14 and the POD charge will be calculated as part of Article 9.9. Article 14 should clarify the buy-out of both costs and the respective location in the T&Cs for the calculation of the buy-out amounts.

**Other**

12. Article 6 – Security & Customer Agreements  
For facilities in excess of AESO Standard Facilities, distribution companies must provide security  Support  
 Oppose  
 Indifferent

Reasons for Stakeholder Position:

13. Article 17 – Service Interruptions & Force Majeure  
Language revised to note that other events other than the events provided may cause a service interruption  Support  
 Oppose  
 Indifferent

Reasons for Stakeholder Position:

14. Article 21 – Miscellaneous Notices are expanded to include emails as an acceptable form of notification	<input type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
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Reasons for Stakeholder Position:

<b>Additional Comments</b>

Please return this form with your comments by October 10, 2006, to:

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Manager, Regulatory  
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Fax: (403) 539-2524

Lee Ann Leduc  
Senior Regulatory Analyst  
E-mail: [leeann.leduc@aeso.ca](mailto:leeann.leduc@aeso.ca)  
Phone: (403) 539-2741  
Fax: (403) 539-2524

**AESO 2007 Terms and Conditions Consultation  
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Comments From: EPCOR Utilities Inc.  
Date: October 10 2006  
Contact: Ewa Kultys  
Phone: (780) 412-4019  
E-mail: ekultys@epcor.ca

On September 21, 2006, the AESO presented a current draft of terms and conditions proposals to be included in its 2007 tariff application. The presentation focussed on matters which had changed significantly since the previous presentation on June 29, 2006. The AESO invites stakeholders to provide comments on the proposals presented on September 21, using the following comment form.

<b>Article 1 – Definitions &amp; Interpretation</b>	
1. Addition of new defined term Substation Fraction	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
Reasons for Stakeholder Position: EPCOR supports the addition of this new defined term, "Substation Fraction".	
2. Revised document references regarding Interconnection Requirements	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
Reasons for Stakeholder Position: EPCOR supports the amendment and update to reflect the current interconnection requirements.	
3. Replaced "RMS" / "Reliability Management System" with Reliability Standards and updated definition	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
Reasons for Stakeholder Position: EPCOR supports the replacement of "RMS" / "Reliability Management System" with Reliability Standards and updated definition.	

<b>Article 9 – Prepaid O&amp;M</b>	
4. Propose to remove the O&M charge on AESO Standard Facilities	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
Reasons for Stakeholder Position: <ul style="list-style-type: none"> <li>• EPCOR supports the removal of the O&amp;M charge on the Standard Facilities that were never combined historically for siting signals purposes. EPCOR suggests the prepaid O&amp;M charge for the optional, non-standard facilities be based on a forecast commercial</li> </ul>	

life, rather than on the DTS contract length due to the difficulty of forecasting the DTS contract life.

**Article 9 – Maximum Investment Function**

5. The proposed cost function design considers a two part approach, where the minimum cost function is used to determine the minimum fixed cost for any project and average cost function for projects beyond the average DTS capacity of 17 MW.
- Support  
 Oppose  
 Indifferent

Proposed cost function:  
\$2.296m  
+(\$0.279m/MW x first 17 MW of DTS capacity)  
+(\$0.154m/MW x DTS Capacity above 17 MW)

Reasons for Stakeholder Position:  
Adhering to the comments sent on July 11, 2006, EPCOR disagrees that the proposed method is appropriate, as it sacrifices inter-generational equity in order to achieve increased investment. Contribution policy is about fairness and the boundary of “postage stamp” rates. It is not about precise cost functions of locational signals.

6. Although there were concerns regarding the data sample i.e. statistical validity, data sample representation, data scatter around average cost function and concern that higher costs may be attributed to smaller customers than what is actually incurred, utilizing the minimum cost function in cooperation with the average cost function is a reasonable approach.
- Support  
 Oppose  
 Indifferent

Reasons for Stakeholder Position:  
Refer to EPCOR’s comments in #5 above.

7. As per Directive 13a part 3 a multiplier was used to determined the proposed investment function:
- Support  
 Oppose  
 Indifferent
- Proposed investment function:  
\$2.985m  
+(\$0.363m/MW x first 17 MW of DTS capacity)  
+(\$0.200m/MW x DTS Capacity above 17 MW)

Reasons for Stakeholder Position:  
Following the comments of July 11, 2006, EPCOR submits that the underlining 80/20 criterion is only a guideline and should not be taken as a rigid metric to be met at all cost. EPCOR does not support revisions to the investment formula especially based on limited data (5 or 6 years) which is not sufficient to conclude that the 80/20 criterion is necessarily appropriate. Other rate design criteria such as stability have to be considered.

8.	<p>The AESO has sufficiently complied with Direction 13A of EUB Decision 2005-096, and was able to effectively address the following through the course of the Customer Contribution Study:</p> <ol style="list-style-type: none"> <li>1. <i>Incorporate a sufficient number and diversity of data points</i></li> <li>2. <i>Determine the Raw Interconnection Project Cost Function</i></li> <li>3. <i>Determine an appropriate multiplier such that 80% of projects do not pay a contribution.</i></li> </ol>	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
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Reasons for Stakeholder Position:  
 EPCOR disagrees that the AESO has sufficiently met Direction 13A of EUB Decision 2005-096. In particular, the AESO has not examined the possibility of the non-linear outcomes as expected by the Board. Furthermore, this question is better presented to the Board.

**Article 9 – Contract Capacity Increases**

9.	<p>For contract capacity increases requiring the construction of new transmission facilities, the approved tariff at the time customer demonstrates sufficient commitment as per the AESO’s business practices will be applied to the project.</p>	<input type="checkbox"/> Support <input type="checkbox"/> Oppose <input checked="" type="checkbox"/> Indifferent
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Reasons for Stakeholder Position:

10.	<p>For contract capacity changes along with the other events outlined in Articles 9.9 &amp; 9.10, customer contributions will be recalculated based upon the tariff used in the original calculation.</p>	<input type="checkbox"/> Support <input type="checkbox"/> Oppose <input checked="" type="checkbox"/> Indifferent
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Reasons for Stakeholder Position:

**Article 14 – Reductions or Termination of Contract Capacity**

11.	<p>Contract capacity reduction or termination buy out calculations will only include the System Charge as contained in the DTS rate schedule.</p>	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
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Reasons for Stakeholder Position: EPCOR supports that contract capacity reduction or buy out calculations will only include the System Charge and agrees that the POD charge should not be included in these calculations.

**Other**

12.	<p>Article 6 – Security &amp; Customer Agreements          For facilities in excess of AESO Standard Facilities, distribution companies must provide security</p>	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
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Reasons for Stakeholder Position: EPCOR believes that for any required facilities in excess of AESO Standard Facilities, security should be provided by the Customers, and not limiting only on the distribution companies. “Standard Facilities” and other related interconnection and/or security matters would also need to be discussed and defined with the Customers

13.	Article 17 – Service Interruptions & Force Majeure Language revised to note that other events other than the events provided may cause a service interruption	<input type="checkbox"/> Support <input type="checkbox"/> Oppose <input checked="" type="checkbox"/> indifferent
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Reasons for Stakeholder Position:

14.	Article 21 – Miscellaneous Notices are expanded to include emails as an acceptable form of notification	<input type="checkbox"/> Support <input type="checkbox"/> Oppose <input checked="" type="checkbox"/> Indifferent
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Reasons for Stakeholder Position:

<b>Additional Comments</b>

Please return this form with your comments by October 10, 2006, to:

Ed Hucman  
Manager, Regulatory  
E-mail: [ed.hucman@aeso.ca](mailto:ed.hucman@aeso.ca)  
Phone: (403) 539-2469  
Fax: (403) 539-2524

Lee Ann Leduc  
Senior Regulatory Analyst  
E-mail: [leeann.leduc@aeso.ca](mailto:leeann.leduc@aeso.ca)  
Phone: (403) 539-2741  
Fax: (403) 539-2524

**AESO 2007 Terms and Conditions Consultation  
September 21, 2006 Stakeholder Presentation — Stakeholder Comment Form**

Comments From: FortisAlberta  
Date: October 10, 2006  
Contact: Miles Stroh  
Phone: (403) 514-4229  
E-mail: Miles.Stroh@fortisalberta.com

In response for the AESO's request for comments on its 2007 AESO Tariff consultation, FortisAlberta submits that based on an initial review, it is largely supportive of the AESO's general direction and preliminary proposals with respect to the rates and terms & conditions as tabled in its 2007 Tariff consultation.

However, as discussed previously, there is one proposed change to the T&Cs that FortisAlberta opposes, as outlined below:

**Terms and Conditions - Stakeholder Comment Form:**

<b><i>Other</i></b>
12. Article 6 – Security & Customer Agreements For facilities in excess of AESO Standard Facilities, distribution companies must provide security  <i>FortisAlberta Opposes.</i>
Reasons for Stakeholder Position:  FortisAlberta opposes this proposed change as it is contrary to and inconsistent with FortisAlberta's concern and the Board's rationale in Decision 2005-096 on this matter in the 2006 AESO Tariff proceeding. That is, it unnecessarily adds costs to the distribution customers' rates for a risk that is non-existent or negligible. Further, there is no difference in the level of risk for distribution company requested projects, regardless of whether the project costs are made up of standard facilities or otherwise, given that the need and facilities for the transmission upgrades require regulatory oversight and approval in any event.

If you have any questions or would like to discuss further, please do not hesitate to contact me at (403) 514-4229 or Dani Ryan at (403) 514-4071. Thank you for the opportunity to comment and provide input prior to filing.

Miles Stroh  
FortisAlberta Inc.  
Regulatory Affairs

**AESO 2007 Terms and Conditions Consultation  
September 21, 2006 Stakeholder Presentation — Stakeholder Comment Form**

Comments From: IPCAA  
 Date: October 10, 2006  
 Contact: Ron Mikkelsen / Dan Macnamara  
 Phone: (403) 263-3326 / (403) 266-3180  
 E-mail: [consult@drazen.com](mailto:consult@drazen.com) / [dmacnamara@shaw.ca](mailto:dmacnamara@shaw.ca)

On September 21, 2006, the AESO presented a current draft of terms and conditions proposals to be included in its 2007 tariff application. The presentation focussed on matters which had changed significantly since the previous presentation on June 29, 2006. The AESO invites stakeholders to provide comments on the proposals presented on September 21, using the following comment form.

<b>Article 1 – Definitions &amp; Interpretation</b>	
1. Addition of new defined term Substation Fraction	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
Reasons for Stakeholder Position:	
2. Revised document references regarding Interconnection Requirements	<input type="checkbox"/> Support <input type="checkbox"/> Oppose <input checked="" type="checkbox"/> Indifferent
Reasons for Stakeholder Position:	
3. Replaced “RMS” / “Reliability Management System” with Reliability Standards and updated definition	<input type="checkbox"/> Support <input type="checkbox"/> Oppose <input checked="" type="checkbox"/> Indifferent
Reasons for Stakeholder Position:	

<b>Article 9 – Prepaid O&amp;M</b>	
4. Propose to remove the O&M charge on AESO Standard Facilities	<input type="checkbox"/> Support <input type="checkbox"/> Oppose <input checked="" type="checkbox"/> Indifferent
Reasons for Stakeholder Position: This would appear to be a question in inter-generation equity, but it should be recognized that the multiplier selected to derive 80% of projects not requiring a contribution likely “removes” or renders irrelevant the O&M charge.	

**Article 9 – Maximum Investment Function**

5. The proposed cost function design considers a two part approach, where the minimum cost function is used to determine the minimum fixed cost for any project and average cost function for projects beyond the average DTS capacity of 17 MW.

- Support
- Oppose
- Indifferent

Proposed cost function:  
\$2.296m  
+(\$0.279m/MW x first 17 MW of DTS capacity)  
+(\$0.154m/MW x DTS Capacity above 17 MW)

Reasons for Stakeholder Position:

6. Although there were concerns regarding the data sample i.e. statistical validity, data sample representation, data scatter around average cost function and concern that higher costs may be attributed to smaller customers than what is actually incurred, utilizing the minimum cost function in cooperation with the average cost function is a reasonable approach.

- Support
- Oppose
- Indifferent

Reasons for Stakeholder Position:

Regardless of the details of setting the numbers, the approach preserves the Board decision to have the rate and investment level reflect economies of scale for POD facilities.

7. As per Directive 13a part 3 a multiplier was used to determined the proposed investment function:

- Support
- Oppose
- Indifferent

Proposed investment function:  
\$2.985m  
+(\$0.363m/MW x first 17 MW of DTS capacity)  
+(\$0.200m/MW x DTS Capacity above 17 MW)

Reasons for Stakeholder Position:

8. The AESO has sufficiently complied with Direction 13A of EUB Decision 2005-096, and was able to effectively address the following through the course of the Customer Contribution Study:

1. *Incorporate a sufficient number and diversity of data points*
2. *Determine the Raw Interconnection Project Cost Function*
3. *Determine an appropriate multiplier such that 80% of projects do not pay a contribution.*

- Support
- Oppose
- Indifferent

Reasons for Stakeholder Position:

**Article 9 – Contract Capacity Increases**

9.	For contract capacity increases requiring the construction of new transmission facilities, the approved tariff at the time customer demonstrates sufficient commitment as per the AESO's business practices will be applied to the project.	<input type="checkbox"/> Support <input type="checkbox"/> Oppose <input checked="" type="checkbox"/> Indifferent
Reasons for Stakeholder Position:		
10.	For contract capacity changes along with the other events outlined in Articles 9.9 & 9.10, customer contributions will be recalculated based upon the tariff used in the original calculation.	<input type="checkbox"/> Support <input type="checkbox"/> Oppose <input checked="" type="checkbox"/> Indifferent
Reasons for Stakeholder Position:		

**Article 14 – Reductions or Termination of Contract Capacity**

11.	Contract capacity reduction or termination buy out calculations will only include the System Charge as contained in the DTS rate schedule.	<input type="checkbox"/> Support <input type="checkbox"/> Oppose <input checked="" type="checkbox"/> Indifferent
Reasons for Stakeholder Position:		

**Other**

12.	Article 6 – Security & Customer Agreements For facilities in excess of AESO Standard Facilities, distribution companies must provide security	<input type="checkbox"/> Support <input type="checkbox"/> Oppose <input checked="" type="checkbox"/> Indifferent
Reasons for Stakeholder Position:		
13.	Article 17 – Service Interruptions & Force Majeure Language revised to note that other events other than the events provided may cause a service interruption	<input type="checkbox"/> Support <input type="checkbox"/> Oppose <input checked="" type="checkbox"/> Indifferent
Reasons for Stakeholder Position:		
14.	Article 21 – Miscellaneous Notices are expanded to include emails as an acceptable form of notification	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
Reasons for Stakeholder Position:		

**Additional Comments**

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Please return this form with your comments by October 10, 2006, to:  
Ed Hucman  
Manager, Regulatory  
E-mail: [ed.hucman@ieso.ca](mailto:ed.hucman@ieso.ca)

Phone: (403) 539-2469  
Fax: (403) 539-2524

Lee Ann Leduc  
Senior Regulatory Analyst  
E-mail: [leeann.leduc@aeso.ca](mailto:leeann.leduc@aeso.ca)  
Phone: (403) 539-2741  
Fax: (403) 539-2524

**AESO 2007 Terms and Conditions Consultation  
September 21, 2006 Stakeholder Presentation — Stakeholder Comment Form**

Comments From: PPGA  
Date: October 10, 2006

Contact: Ed de Palezieux, Colin Carlsen, Jamie Shand, Neall Banner  
Phone: 650-4544  
E-mail: ed.depalezieux@shaw.ca

On September 21, 2006, the AESO presented a current draft of terms and conditions proposals to be included in its 2007 tariff application. The presentation focussed on matters which had changed significantly since the previous presentation on June 29, 2006. The AESO invites stakeholders to provide comments on the proposals presented on September 21, using the following comment form.

<b>Article 1 – Definitions &amp; Interpretation</b>	
1. Addition of new defined term Substation Fraction	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
Reasons for Stakeholder Position:	
2. Revised document references regarding Interconnection Requirements	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
Reasons for Stakeholder Position:	
3. Replaced “RMS” / “Reliability Management System” with Reliability Standards and updated definition	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
Reasons for Stakeholder Position:	

<b>Article 9 – Prepaid O&amp;M</b>	
4. Propose to remove the O&M charge on AESO Standard Facilities	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
Reasons for Stakeholder Position:	
<p>The PPGA is supportive of customers paying the O&amp;M charge on non-standard facilities. Standard facilities maintenance costs are more appropriately financed through the TFO’s ongoing costs, as approved by the EUB.</p>	

**Article 9 – Maximum Investment Function**

5. The proposed cost function design considers a two part approach, where the minimum cost function is used to determine the minimum fixed cost for any project and average cost function for projects beyond the average DTS capacity of 17 MW.
- X Support  
X Oppose  
 Indifferent

Proposed cost function:  
\$2.296m  
+(\$0.279m/MW x first 17 MW of DTS capacity)  
+(\$0.154m/MW x DTS Capacity above 17 MW)

Reasons for Stakeholder Position:  
Generally, the PPGA is supportive of the AESO's approach and analysis. However, since no data is available for customers with loads below 7.5 MW, the PPGA is not supportive of the AESO's method for conducting the minimum intercept function. Please refer to the PPGA paper on the AESO website.

6. Although there were concerns regarding the data sample i.e. Statistical validity, data sample representation, data scatter around average cost function and concern that higher costs may be attributed to smaller customers than what is actually incurred, utilizing the minimum cost function in cooperation with the average cost function is a reasonable approach.
- X Support  
 Oppose  
 Indifferent

Reasons for Stakeholder Position:  
The PPGA is supportive of the approach, however not fully supportive of the AESO's methodology. Please refer to the PPGA paper on your website.

7. As per Directive 13a part 3 a multiplier was used to determined the proposed investment function:
- Support  
X Oppose  
 Indifferent
- Proposed investment function:  
\$2.985m  
+(\$0.363m/MW x first 17 MW of DTS capacity)  
+(\$0.200m/MW x DTS Capacity above 17 MW)

Reasons for Stakeholder Position:  
Alberta is currently undergoing phenomenal economic growth. This growth is creating increases in the cost of labour and materials. The PPGA believes that the AESO should increase the cost escalators for 2006 and 2007 to a more realistic level. Perhaps the AESO should consider creating its own inflator, given the cost of materials and labour in Alberta, based upon information supplied by the TFO's.

8.	<p>The AESO has sufficiently complied with Direction 13A of EUB Decision 2005-096, and was able to effectively address the following through the course of the Customer Contribution Study:</p> <ol style="list-style-type: none"> <li>1. <i>Incorporate a sufficient number and diversity of data points</i></li> <li>2. <i>Determine the Raw Interconnection Project Cost Function</i></li> <li>3. <i>Determine an appropriate multiplier such that 80% of projects do not pay a contribution.</i></li> </ol>	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
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Reasons for Stakeholder Position:

The PPGA believes that the AESO has followed the intent of the EUB's directives. However, it is clear that the AESO was not able to gather any data for customers below 7.5 MW. In addition, the AESO's use of 2005 cost estimates for minimum costs of small customer interconnections is not appropriate, and leads to erroneous results. The PPGA proposed an alternative method to handle these difficulties with the data and await an AESO response to the PPGA proposal.

**Article 9 – Contract Capacity Increases**

9.	<p>For contract capacity increases requiring the construction of new transmission facilities, the approved tariff at the time customer demonstrates sufficient commitment as per the AESO's business practices will be applied to the project.</p>	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
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Reasons for Stakeholder Position:

The PPGA is supportive of this aspect of the proposed AESO T&C's. As stated by the AESO, this practice should not be detrimental to customers as long as the 2007 investment level proposed by the AESO is approved.

	<p>For contract capacity changes along with the other events outlined in Articles 9.9 &amp; 9.10, customer contributions will be recalculated based upon the tariff used in the original calculation.</p>	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
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Reasons for Stakeholder Position:

The PPGA is supportive of efforts to align the tariff with the AESO's current practices.

**Article 14 – Reductions or Termination of Contract Capacity**

11.	<p>Contract capacity reduction or termination buy out calculations will only include the System Charge as contained in the DTS rate schedule.</p>	<input type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
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Reasons for Stakeholder Position:

<b>Other</b>		
12.	Article 6 – Security & Customer Agreements For facilities in excess of AESO Standard Facilities, distribution companies must provide security	X Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
Reasons for Stakeholder Position:		
13.	Article 17 – Service Interruptions & Force Majeure Language revised to note that other events other than the events provided may cause a service interruption	X Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
Reasons for Stakeholder Position:		
14.	Article 21 – Miscellaneous Notices are expanded to include emails as an acceptable form of notification	X Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
Reasons for Stakeholder Position:		
<b>Additional Comments</b>		

Please return this form with your comments by October 10, 2006, to:

Ed Hucman  
 Manager, Regulatory  
 E-mail: [ed.hucman@ieso.ca](mailto:ed.hucman@ieso.ca)  
 Phone: (403) 539-2469  
 Fax: (403) 539-2524

Lee Ann Leduc  
 Senior Regulatory Analyst  
 E-mail: [leeann.leduc@ieso.ca](mailto:leeann.leduc@ieso.ca)  
 Phone: (403) 539-2741  
 Fax: (403) 539-2524

**AESO 2007 Terms and Conditions Consultation  
September 21, 2006 Stakeholder Presentation — Stakeholder Comment Form**

Comments From: TransCanada Energy  
 Date: October 17, 2006  
 Contact: Cheryl Terry/Dan Levson  
 Phone: 920-2092/920-2095  
 E-mail: [Cheryl\\_Terry@Transcanada.com](mailto:Cheryl_Terry@Transcanada.com) / [Dan\\_Levson@TransCanada.com](mailto:Dan_Levson@TransCanada.com)

On September 21, 2006, the AESO presented a current draft of terms and conditions proposals to be included in its 2007 tariff application. The presentation focussed on matters which had changed significantly since the previous presentation on June 29, 2006. The AESO invites stakeholders to provide comments on the proposals presented on September 21, using the following comment form.

<b>Article 1 – Definitions &amp; Interpretation</b>	
1.	Addition of new defined term Substation Fraction <div style="float: right;"> <input type="checkbox"/> Support  <input type="checkbox"/> Oppose  <input checked="" type="checkbox"/> Indifferent                     </div>
Reasons for Stakeholder Position: While TransCanada does not oppose the use of the defined term for Substation Fraction, TransCanada maintains the inappropriateness of applying that Substation Fraction to a customer who already owns a substation. Alternatively, if the Substation Fraction is applied to a substation owned by the customer, the payment for the load-related portion of that fraction should be charged to the customer (the current practice) and then repaid to the customer whenever that customer has not received any investment from the AESO (a new practice). Please also refer to TransCanada’s July 11, 2006 comment form on Article 9 (item 8).	
2.	Revised document references regarding Interconnection Requirements <div style="float: right;"> <input checked="" type="checkbox"/> Support  <input type="checkbox"/> Oppose  <input type="checkbox"/> Indifferent                     </div>
Reasons for Stakeholder Position: The change appears to be adding more standards that are also relevant.	
3.	Replaced “RMS” / “Reliability Management System” with Reliability Standards and updated definition <div style="float: right;"> <input checked="" type="checkbox"/> Support  <input type="checkbox"/> Oppose  <input type="checkbox"/> Indifferent                     </div>
Reasons for Stakeholder Position: Greater alignment with the Transmission Regulation is appropriate.	

**Article 9 – Prepaid O&M**

4. Propose to remove the O&M charge on AESO Standard Facilities  Support  
 Oppose  
 Indifferent

Reasons for Stakeholder Position: TransCanada agrees with the rationale provided by the AESO regarding the removal of O & M Charges on standard facilities.

**Article 9 – Maximum Investment Function**

5. The proposed cost function design considers a two part approach, where the minimum cost function is used to determine the minimum fixed cost for any project and average cost function for projects beyond the average DTS capacity of 17 MW.  Support  
 Oppose  
 Indifferent

Proposed cost function:  
\$2.296m  
+(\$0.279m/MW x first 17 MW of DTS capacity)  
+(\$0.154m/MW x DTS Capacity above 17 MW)

Reasons for Stakeholder Position: While the proposed cost function is preferable to the current tariff, it could be further refined in two areas. The investment level could be adjusted year by year by an inflation factor in Article 9.6 (a). This would avoid the situation where the maximum local investment is understated due to tariffs that are not being regularly adjusted. The benefit of an automatic inflation factor is that it would avoid the need to have the tariff adjusted every year. The second adjustment to consider relates to the proposal by the PPGA for a second break point in the cost function. Please refer to TransCanada's comment in the Rates Consultation, section 5 under Point of Delivery Costs.

6. Although there were concerns regarding the data sample i.e. statistical validity, data sample representation, data scatter around average cost function and concern that higher costs may be attributed to smaller customers than what is actually incurred, utilizing the minimum cost function in cooperation with the average cost function is a reasonable approach.  Support  
 Oppose  
 Indifferent

Reasons for Stakeholder Position: See comments under 5 above.

7. As per Directive 13a part 3 a multiplier was used to determined the proposed investment function:  Support  
 Oppose  
 Indifferent
- Proposed investment function:  
\$2.985m  
+(\$0.363m/MW x first 17 MW of DTS capacity)  
+(\$0.200m/MW x DTS Capacity above 17 MW)

Reasons for Stakeholder Position: A multiplier required to adjust the investment function to

meet the 80/20 rule of thumb is appropriate.	
8. The AESO has sufficiently complied with Direction 13A of EUB Decision 2005-096, and was able to effectively address the following through the course of the Customer Contribution Study: <ol style="list-style-type: none"> <li>1. <i>Incorporate a sufficient number and diversity of data points</i></li> <li>2. <i>Determine the Raw Interconnection Project Cost Function</i></li> <li>3. <i>Determine an appropriate multiplier such that 80% of projects do not pay a contribution.</i></li> </ol>	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
Reasons for Stakeholder Position: Subject to the recommended refinements noted above, TransCanada generally supports the direction of the Customer Contribution Study.	

<b>Article 9 – Contract Capacity Increases</b>	
9. For contract capacity increases requiring the construction of new transmission facilities, the approved tariff at the time customer demonstrates sufficient commitment as per the AESO's business practices will be applied to the project.	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
Reasons for Stakeholder Position: TransCanada generally agrees with the AESO's proposal.	
10. For contract capacity changes along with the other events outlined in Articles 9.9 & 9.10, customer contributions will be recalculated based upon the tariff used in the original calculation.	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
Reasons for Stakeholder Position: TransCanada generally agrees with the AESO's proposal.	

<b>Article 14 – Reductions or Termination of Contract Capacity</b>	
11. Contract capacity reduction or termination buy out calculations will only include the System Charge as contained in the DTS rate schedule.	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
Reasons for Stakeholder Position: TransCanada understands this proposal avoids double charging of fixed POD charges since Article 9.9 also recovers fixed POD charges when a customer reduces their contract capacity.	

<b>Other</b>	
12. Article 6 – Security & Customer Agreements For facilities in excess of AESO Standard Facilities, distribution companies must provide security	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
Reasons for Stakeholder Position: Discos should be treated on a level playing field with other customers as much as reasonable.	

13.	<p>Article 17 – Service Interruptions &amp; Force Majeure  Language revised to note that other events other than the events provided may cause a service interruption</p>	<input type="checkbox"/> Support <input type="checkbox"/> Oppose <input checked="" type="checkbox"/> Indifferent
Reasons for Stakeholder Position: TransCanada has not conducted a legal assessment of the implications of the changed definition of Force Majeure.		
14.	<p>Article 21 – Miscellaneous  Notices are expanded to include emails as an acceptable form of notification</p>	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
Reasons for Stakeholder Position: TransCanada supports email notifications assuming they are sent by authorized personnel as identified in the various agreements between the AESO and the AESO customer.		

### **Additional Comments**

Article 3.1 proposes a clarification to better align the tariff with operational and planning practices. In essence, the condition of not providing the customer with service in excess of 110% of the Contract Capacity will be dropped. The AESO may want to further clarify this statement to recognize that the system must be planned for MVA and not just MW. For example, should a customer request system access service for 100 MW and has a 90% power factor, the planners will need to plan for 100 MW and 110 MVA of capacity.

Article 5.3 item e) states that it is subject to Article 5.3, making it subject to itself which is a circularity. Should this read "subject to other sections of Article 5.3"?

Regarding Article 9.2 and the proposed changes, TransCanada remains opposed to this change unless the article is further revised to allow for customer contribution payments as the costs are incurred by the TFO, at least as a customer option and unless there are some unique queue-related constraint issues. While TransCanada supports the idea that neither the AESO nor other customers should incur costs as a result of a customer who defaults on payments or cancels their project, TransCanada is opposed to payment of Customer Contributions well in advance of when the costs are actually incurred. The signing of a Construction Commitment Agreement ("CCA") can occur at a relatively early stage in the project development. It can be signed many months, even years, before significant expenditures are incurred by the TFO. In the case of a large contribution for a long radial transmission line, the costs required up front could be multiple millions of dollars. For the procurement of long lead items such as transformers, TransCanada understands that the TFO is not required to pay the entire cost of the transformer on the day the order is placed while the AESO requires that the customer contribution be paid in full when the CCA is signed. Transformer manufacturers require the TFO to agree to cancellation costs and advance funds as the transformers are manufactured. TransCanada requests that the costs incurred by the TFO also be collected through a schedule of payments from the customer rather than the entire cost up front. TransCanada recommends that a customer be allowed to make payments about a month ahead of the time they are actually incurred and when future cancellation costs for long lead time orders are required, a letter of credit should be used if needed.

Regarding Article 15.1, the AESO has been in the practice of requiring the customer to provide credit for all transmission facilities during the construction period. Customer contributions are collected when the Construction Commitment Agreement is signed and the balance of the transmission facilities costs require credit approval. Article 15.1 would be clearer if it stated the credit requirements are for construction of facilities required to provide system access service that are not covered by a customer contribution. For context, it is noted that cancellation costs must be paid by the customer (presumably for facilities not covered by a customer contribution) when the customer cancels the request for service per Article 9.8 (c).

Please return this form with your comments by October 10, 2006, to:

Ed Hucman

Manager, Regulatory

E-mail: [ed.hucman@aeso.ca](mailto:ed.hucman@aeso.ca)

Phone: (403) 539-2469

Fax: (403) 539-2524

Lee Ann Leduc

Senior Regulatory Analyst

E-mail: [leeann.leduc@aeso.ca](mailto:leeann.leduc@aeso.ca)  
Phone: (403) 539-2741  
Fax: (403) 539-2524