



February 7, 2007

Submitted via EUB Digital Data Submission System

Alberta Energy and Utilities Board
640 – 5th Avenue SW
Calgary, Alberta
T2P 3G4

Attention: Jamie Cameron, Application Officer

Dear Mr. Cameron:

**Re: AESO 2007 GTA (Application No. 1485517)
AESO Comments on Motions Respecting AESO Responses to Information Requests**

On February 5, 2007 the Alberta Electric System Operator (AESO) filed its response to the motions of EnCana, IPCAA, and TransCanada Energy (TCE) in accordance with the process established by the Alberta Energy and Utilities Board (EUB) in its letters of February 1 and February 2, 2007. The AESO offers the following comments on additional submissions by parties subsequent to that filing.

1. Consumer Group

The AESO has reviewed the February 5, 2006 letter from the Consumer Group (CG) which supports the motions of EnCana, IPCAA, and TCE and asks (albeit without a formal motion) for similar relief in respect of certain responses provided to CG information requests (IRs). The AESO responds to the CG request as follows.

Information Request CG.AESO-008 (a-b) seeks monthly billing determinants by customer, while CG.AESO-014 (a) seeks similar data on an historical basis. (The AESO notes that CG.AESO-014 (b) requests data which has been provided in the response to BR.AESO-003 (a) which was filed by the AESO on February 5, 2007.)

The AESO declined to provide the detailed per-customer information requested in each case, as both forecast and actual historical individual customer billing determinants should, in the AESO's view, be treated as confidential information. In response to CG.AESO-014 (a), the AESO referred CG to the response to IPCAA.AESO-032 (a-b) which stated in part:

The AESO views the individual customer billing determinants utilized in the bill impact analysis to be confidential information, and does not consider it

appropriate to disclose such information publicly. The analysis was based on monthly customer-specific data for metered energy, metered demand, coincident demand, contract capacity, substation fraction, and average commodity price. The AESO considers that providing this quantity of detailed individual data, even when not identified by customer name or account, exceeds the usual standards of disclosure for billing information.

As noted in this response, the requested information includes metered energy, metered demand, coincident demand, contract capacity, substation fraction, and average commodity price on a customer-specific basis. Such information is compiled by the AESO in the process of providing system access service and is not otherwise available to the public. Billing determinants are generally provided only in aggregate in tariff proceedings, and this is the approach the AESO has taken in its 2007 GTA. The AESO has also provided summary information on a customer-specific basis to a level of detail not provided in its previous tariff applications. CG now requests that the AESO provide even more detailed information, specifically, two years of historical billing data and one year of forecast billing data for each customer of the AESO.

The AESO maintains that it should not be obliged to disclose individual customer billing determinant information. Such information is clearly of a commercial and financial nature that is consistently treated as confidential by the AESO. There can be no doubt that the provision of the requested customer data over such a lengthy period could result in harm to a customer's competitive position by disclosing patterns and trends that could be used to advantage by a competitor. The AESO submits that the CG request exceeds any reasonable requirement for the disclosure of billing determinant information, and the AESO response meets the requirements of Rule 28 (c) of the EUB's *Rules of Practice* (Rules).

2. Responses to IR Deficiency Motions

The EUB's process letters clearly stated that it was "appropriate to provide the AESO with an opportunity to respond to the Motions." Notwithstanding, CG and Powerex submitted comments concerning the motions, while TCE and EnCana submitted comment on their own motions and those of other parties. The AESO suggests that these submissions appear to be beyond the parameters established by the EUB, particularly the latter two, given the right of later reply accorded to them.

The general theme in the above noted submissions is that additional responses to the identified IRs are important to evaluate the AESO's proposed rates and better understand the AESO's assumptions, and would allow intervenors to prepare fully-informed and well-considered evidence. As the AESO detailed in its February 5 letter, many of the identified IRs were fully and adequately responded to, meeting the requirements of Rule 28. Respectfully, the AESO submits the extensive information provided in the AESO's application and in the filed IR responses provides complete and sufficient information by which the AESO's proposals can be assessed, with the exception of those IRs to which the AESO will be providing revised responses as listed in the its letter of February 5.

3. Comments on Proposed Extension of Time

As stated in its February 5 letter, the AESO affirms its view that it is reasonable to extend the deadline for filing of intervenor evidence to two weeks after the filing of final IR responses.

If you have any questions or need additional information on matters addressed in this letter, please contact me at (403) 539-2751 or by e-mail to heidi.kirrmaier@aeso.ca, or John Martin at (403) 539-2465 or by e-mail to john.martin@aeso.ca.

Sincerely,

[original signed by]

Heidi Kirrmaier
Vice-President, Regulatory

cc: John Martin, Manager, Regulatory, AESO