



May 5, 2008

*Submitted via Digital Data Submission System*

Alberta Utilities Commission  
Utilities Division  
Fifth Avenue Place  
4th Floor, 425 – 1st Street SW  
Calgary, Alberta  
T2P 3L8

Attention: Jamie Cameron, Application Officer

Dear Jamie:

**Re: Argument in AESO 2008 Terms and Conditions Amendment Application (1562873)**

The Alberta Electric System Operator (AESO) provides the following argument on the above-noted application, in accordance with the schedule set out in the April 3, 2008 letter of the Alberta Utilities Commission (AUC).

As explained in the Terms and Conditions Amendment Application, the AESO filed the application to align with revised interconnection process business practices. The revisions to the interconnection process resulted from discussions and consultation with stakeholders, and were based upon several principles, including standard milestone obligations, that addressed concerns identified with the existing interconnection process. The AESO received generally positive feedback with regard to the proposed practices, and therefore implemented them effective February 1, 2008.

The proposed amendments to the AESO's terms and conditions of service simply clarify those aspects of the tariff which relate to the interconnection process and align with and support that process. The proposed amendments do not alter the underlying intent of the previously-approved terms and conditions.

The AESO notes no party has filed any objection to the proposed amendment to date in this proceeding, and the AUC was the only party to ask information requests of the AESO. The AESO responded to the AUC's requests on April 28, 2008, and those responses did not reveal any issues that suggested the proposed amendments were inappropriate, unreasonable, or unjust. As explained in Information Response AUC.AESO-003 (b), amendment of the terms and conditions at this time will avoid confusion that could otherwise arise.

The AESO therefore submits that the proposed amendments to the terms and conditions of service be approved as filed.

If you have any questions regarding this argument, please contact me at (403) 539-2465 or by e-mail to [john.martin@aeso.ca](mailto:john.martin@aeso.ca).

Yours truly,

*[original signed by]*

John Martin  
Director, Tariff Applications

cc: Heidi Kirrmaier, Vice-President, Regulatory, AESO  
Lee Ann Leduc, Senior Regulatory Analyst, AESO