



August 22, 2008

*Submitted via Digital Data Submission System*

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

Attention: Jamie Cameron, Application Officer

Dear Jamie:

**Re: Responses to Information Requests on AESO 2004-2007 Deferral Account Reconciliation Application (Application 1574594, Proceeding ID 60)**

On August 7, 2008, the Alberta Utilities Commission (AUC) distributed a process schedule for the above-noted application which included responses to second-round information requests on September 2, 2008. The AESO advises the AUC that it does not expect to be able to satisfactorily complete responses to the information requests by that date.

The responses cannot be completed by September 2 because of the relatively large amount of work required to answer some of the information requests and the unavailability of key employees due to vacation schedules. The AESO will instead file responses no later than the following Tuesday, September 9, 2008. The AESO considers it would be reasonable to extend the due dates for written argument and written reply by a week as well.

The AESO also advises that it will not be filing responses to certain of TransCanada's information requests, in accordance with section 31(1) of AUC Rule 001 regarding AUC Rules of Practice. The AESO considers that the affected information requests are irrelevant, cannot be answered with reasonable effort, or require disclosure of information which is confidential. The AESO has discussed these concerns with TransCanada, and proposes providing other information to some of the information requests that may be of assistance to TransCanada. The AESO provides the following comments on the requests which will not be answered or for which the AESO will provide information other than that which was requested.

**TCE.AESO-004 (d)** — This request asks the AESO to provide impacts on customer deferral account balances resulting from a modified interest redistribution, in the form of Appendix H-2. As explained in the AESO's comments on immediate interim settlement submitted on June 25,

2008, it is a significant undertaking to revise the interest redistribution amounts and recalculate the customer allocations, and completing and verifying the recalculation would be expected to take about four calendar weeks. In accordance with section 31(1)(b) of AUC Rule 001, the AESO submits that undertaking such work in response to an information request is not reasonable.

As an alternative response to TransCanada's request, the AESO will provide, if possible, a discussion of the potential magnitude of the impact of the modified interest redistribution on different categories of customers, namely, regulated distribution utilities, DTS direct-connect customers, and STS customers. In the event the AESO is directed to calculate detailed impacts by customer, the AESO expects an additional four weeks would be required to prepare such information.

**TCE.AESO-005 (a-b and d-e) and TCE.AESO-006 (a-b)** — These requests seek information which could allow the identification of individual customers for whom data has been provided anonymously in the appendices to the application, or other information which is considered confidential by the AESO. In accordance with section 31(1)(a) of AUC Rule 001, the AESO submits that much of the requested information (such as the "location(s) in the province where the error(s) occurred" in TCE. AESO-005 (b)) is irrelevant to the matters addressed in the 2004-2007 Deferral Account Reconciliation Application. In particular, the question of the redistribution of interest on amounts included in the application should not be dependent on which specific parties would see increases or decreases to the amounts allocated to them, nor on which specific parties were involved in adjustments reconciled in the application.

In addition, the requested information (which is primarily irrelevant) could allow the identification of individual customers or other parties which, with the extensive information provided in the appendices to the 2004-2007 Application, would result in disclosure of system access service information which is not otherwise available to the public. Therefore, in accordance with section 31(1)(c) of Rule 001, the AESO submits that the requested information is of a commercial and financial nature that is consistently treated as confidential by the AESO, and which could result in harm to a customer's competitive position by disclosing information that could be used to advantage by a competitor.

As an alternative response to TransCanada's request, the AESO will provide, where applicable, the number of customers in each category (regulated distribution utilities, DTS direct-connect customers, and STS customers) involved in each metering-related adjustment, and the amount of the adjustment attributable to each of those customers.

The AESO expects that it will be able to provide full and adequate responses to the balance of information requests received, by September 9, 2008.

The AESO considers copy of this letter to TransCanada to satisfy the requirements of section 31(1) of AUC Rule 001 to file and serve on TransCanada reasons why responses will not be provided to certain information requests. The AESO appreciates the willingness of TransCanada to discuss these requests and to consider other information which may address their interests.

If you have any questions on this matter, please contact me at 403-539-2465 in Calgary 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  
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