October 29, 2008

Submitted via AUC Digital Data Submission (DDS) System

Alberta Utilities Commission
Utilities Division, Calgary Office
Fifth Avenue Place
400, 425 – 1st Street SW
Calgary, Alberta
T2P 3L8

Dear sir or madam:

Re: AESO 2009 Balancing Pool Consumer Allocation Rider F

On October 14, 2008 the Balancing Pool notified the Alberta Electric System Operator (“AESO”) of an estimated annualized positive amount of $389.8 million to be reflected in the AESO’s rates under sections 30 and 82 of the Electric Utilities Act (“EUA”). The annualized amount is similar in nature to that which is currently being refunded to AESO customers through the Balancing Pool Consumer Allocation Rider F under the AESO’s tariff.

The Balancing Pool has requested that the amount be paid to AESO customers as a $6.50/MWh credit during 2009. A copy of the Balancing Pool’s letter providing the notice is attached. The Balancing Pool’s notice complies with the requirements of section 82(4) of the EUA.

Rider F was first implemented as a $1.00/MWh credit in 2006 and increased in subsequent years, with each annual rider approved in orders of the Alberta Energy and Utilities Board (“EUB”), the predecessor of the Alberta Utilities Commission (“AUC”). Rider F was most recently approved as a $5.00/MWh credit effective from January 1 to December 31, 2008, in EUB Order U2007-309 dated November 16, 2007. No objections were received in any of the AESO’s applications for Rider F to date.

Given the increase in the annualized amount for 2009, the AESO has again reviewed the basis for its allocation to AESO customers pursuant to section 82(6)(b) of the EUA. The AESO concludes that an allocation as a $/MWh credit remains appropriate for the following reasons.

1. The annualized amount is calculated based on the Balancing Pool’s forecast revenues and expenses over the expected life of the Balancing Pool. Those revenues and expenses primarily relate to the management of generation assets (specifically any Power Purchase Arrangements (PPAs) held by the Balancing Pool that include the right to exchange electric energy and ancillary services) in a commercial manner, and to the holding of the
Hydro PPA and management of associated payments. The Balancing Pool revenues and expenses, and the annualized amount arising from them, are therefore essentially similar to costs recovered through participation in the electricity market by holders of other generation assets. It is accordingly appropriate that the Balancing Pool annualized amount be allocated on an energy basis.

(2) Proceeds from the auctions of PPAs in 2000 were returned by the Alberta Government to electricity consumers primarily through ¢/kWh rebates on electricity bills in 2001. As the Balancing Pool annualized amount is similarly related to PPAs, the Alberta Government rebate approach provides a relevant precedent for the allocation of the Balancing Pool annualized amount as a $/MWh credit.

Based on these considerations, the AESO accepts the Balancing Pool’s recommendation that the annualized amount continue to be refunded to AESO customers as a $/MWh amount, set at $6.50/MWh credit effective from January 1 to December 31, 2009. The AESO further proposes that other aspects of the 2009 Rider F, including applicability criteria, continue unchanged from the 2008 Rider F which is currently in effect.

The AESO therefore requests approval by the AUC pursuant to subsections 82(5) and (6) of the EUA, for a Balancing Pool Consumer Allocation Rider F to provide a $6.50/MWh credit to all Demand Transmission Service (DTS) and Demand Opportunity Service (DOS) customers, with the exceptions of the City of Medicine Hat and BC Hydro at Fort Nelson, for consumption from January 1 through December 31, 2009, inclusive. A proposed Rider F schedule is attached.

As this application is a simple revision to the level of Rider F and complies with relevant legislation, the AESO requests that the AUC deal with this application through an expedited process.

If you have any questions on this application or need additional information, please contact me at 403-539-2465 or by e-mail to john.martin@aeso.ca.

Sincerely,

[original signed by]

John Martin
Director, Tariff Applications

Attachments

cc: Heidi Kirrmaier, Vice President, Regulatory, AESO
    Doug Heath, Vice President, Balancing Pool
Rider F  Balancing Pool Consumer Allocation Rider

Purpose:  To collect from or refund to AESO Customers an annualized amount estimated by the Balancing Pool and transferred to the AESO under section 82 of the *Electric Utilities Act*.

Applicable to:  Customers receiving service under the following Rate Schedules:
- DTS, with the exception of the City of Medicine Hat
- DOS, with the exceptions of the City of Medicine Hat and BC Hydro at Fort Nelson

Effective:  The rider is effective for all billing periods from January 1, 2009 to December 31, 2009.

Rate:  A credit of **$6.50/MWh** of Metered Energy during the Billing Period.

Terms:  The Terms and Conditions form part of this Rate Schedule.