



December 1, 2009

To: Alberta Utilities Commission (“Commission”)

Re: Notice of Filing – Proposed Modeling, Data, and Analysis (MOD) Alberta Reliability Standards (“Reliability Standards”) and Updated Alberta Reliability Standards Glossary of Terms (“Updated Glossary”):

- a) **MOD-016-AB-1.1 Actual and Forecast Demands, Net Energy for Load;**
 - b) **MOD-017-AB-0.1 Aggregated Actual and Forecast Demands and Net Energy for Load;**
 - c) **MOD-018-AB-0 Reports of Actual and Forecast Demand Data;**
 - d) **MOD-019-AB-0 Forecasts of Interruptible Demands Data;**
 - e) **Updated Glossary**
1. Please be advised that pursuant to Section 19(4)(b) of the *Transmission Regulation* the Alberta Electric System Operator (“AESO”) is recommending that the Alberta Utilities Commission (“Commission”) approve the above-captioned Reliability Standards and Updated Glossary.
 2. These Reliability Standards are only applicable to the AESO.
 3. The Reliability Standards and Updated Glossary are based on the reliability standards and definitions developed and enforced by the North American Electric Reliability Corporation (“NERC”) in the United States. NERC was approved as the Electric Reliability Organization (“ERO”) for the United States by the Federal Energy Regulatory Commission (“FERC”) as per the US Energy Policy Act. NERC has been granted recognition as the ERO by the Minister of Energy in Alberta pursuant to Section 20 of the *Transmission Regulation*.
 4. These Reliability Standards and Updated Glossary contain certain changes from the ERO reliability standards and definitions to ensure that the standards are properly aligned with the industry structure and adapted for application in Alberta. The AESO has consulted with those market participants that it considers are likely to be directly affected in accordance with Section 19(4)(a) of the *Transmission Regulation*.
 5. The AESO is also including as attachments tables comparing the recommended Reliability Standard with the equivalent NERC reliability standard. These attachments are being provided for information purposes with the understanding they may assist the Commission in its review when satisfying itself under Section 19(5) of the *Transmission Regulation*.



Summary of Reliability Standards

MOD-016-AB-1.1 Actual and Forecast Demands, Net Energy for Load

6. The purpose of this Reliability Standard is to ensure that accurate, actual demand data is available to support assessments and validation of past events and databases, and forecast demand data is available to support future system assessments to identify the need for system reinforcements for continued reliability.
7. This new Reliability Standard is based on the FERC approved NERC reliability standard titled MOD-016-1.1 Actual and Forecast Demands, Net Energy for Load, Controllable DSM.

MOD-017-AB-0.1 Aggregated Actual and Forecast Demands and Net Energy for Load

8. The purpose of this Reliability Standard is to ensure that reporting of actual demand data is performed in order to allow for the assessment and validation of past events and databases, and that the reporting of forecast demand data is performed to allow for the future system assessment to identify the need for system reinforcement for continued reliability.
9. This new Reliability Standard is based on the FERC approved NERC reliability standard titled MOD-017-0.1 Aggregated Actual and Forecast Demands and Net Energy for Load.

MOD-018-AB-0 Reports of Actual and Forecast Demand Data

10. The purpose of this Reliability Standard is to ensure that reporting of actual demand data is performed in order to allow for the assessments and validation of past events and databases, and that the reporting of forecast demand data is performed to allow for future system assessments to identify the need for system reinforcement for continued reliability.
11. This new Reliability Standard is based on the FERC approved NERC reliability standard titled MOD-018-0 Reports of Actual and Forecast Demand Data.



MOD-019-AB-0 Forecasts of Interruptible Demands Data

12. The purpose of this Reliability Standard is to ensure that reporting of actual demand data is performed so that assessments and validation of past events and databases can be performed, and so that the reporting of forecast demand data can be performed to allow for the future system assessments to identify the need for system reinforcement for continued reliability.
13. This new Reliability Standard is based on the FERC approved NERC reliability standard titled MOD-019-0 Forecasts of Interruptible Demands and DCLM Data.

Updated Glossary

14. The following new terms are proposed for inclusion in the Alberta Reliability Standards Glossary of Terms:
 - a) interruptible demand

Attachments to Notice of Filing

15. Please find the following attached to this Notice of Filing:
 - a) The [Letter of Notice](#) that was sent to market participants that the AESO considers likely to be affected by these changes and that was posted on the AESO web site on September 9, 2009. In this letter, the AESO sought feedback from stakeholders;
 - b) The [Stakeholder Comments on Letter of Notice](#) letter (posted October 15, 2009) with written comments received, the name of market participants that submitted each comment in response to the Letter of Notice and the date on which the comment was submitted;
 - c) The [Final Recommended Reliability Standards](#) letter (posted on November 16, 2009) with the AESO's reply to comments received;
 - d) Copies of the following filed Reliability Standards, comparison documents and Updated Glossary:
 - i) [MOD-016-AB-1.1](#) (clean);
 - ii) [Comparison Document](#) between MOD-016-1.1 and MOD-016-AB-1.1;
 - iii) [MOD-017-AB-0.1](#) (clean);



- iv) [Comparison Document](#) between MOD-017-0.1 and MOD-017-AB-0.1;
- v) [MOD-018-AB-0](#) (clean);
- vi) [Comparison Document](#) between MOD-018-0 and MOD-018-AB-0;
- vii) [MOD-019-AB-0](#) (clean); and
- viii) [Comparison Document](#) between MOD-019-0 and MOD-019-AB-0;
- ix) Updated Glossary ([Blacklined](#) and [Clean](#))

Please be advised that certain of the attachments noted above include reference to other Reliability Standards that are not the subject of this filing.

Proposed Effective Date

16. Proposed effective dates are as follows:

- MOD-016-AB-1.1:** Ten (10) calendar days following approval by the Commission;
- MOD-017-AB-0.1:** Ten (10) calendar days following approval by the Commission;
- MOD-018-AB-0:** Ten (10) calendar days following approval by the Commission;
- MOD-019-AB-0:** Ten (10) calendar days following approval by the Commission.

17. The AESO submits that the filed Reliability Standards and Updated Glossary noted above, comply with the requirements of the Transmission Regulation, are not technically deficient, and are in the public interest.

Yours truly,

<original signed by>

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Attachments

Filed with Commission: 2009-12-01