



March 11, 2010

Dear Market Participants and Interested Parties:

**Re: AESO Reply to Stakeholder Comments - Proposed Level II Removal of:**

- a) Certain ISO Rules Section G1 Definitions;**
- b) OPP 507 Demand Opportunity Service (DOS) Request; and**
- c) OPP 901 Demand Opportunity Service (DOS) Curtailments (collectively “DOS OPP Removals”)**

In accordance with Alberta Utilities Commission (“AUC” or “Commission”) Rule 017, please find attached the AESO reply to stakeholder comments regarding the DOS OPP Removals. The proposed DOS OPP Removals being recommended for internal AESO approval in March of 2010 are attached. Please note that the DOS OPP Removals were initially distributed for consultation on January 28, 2010.

### **Transition of Authoritative Documents (“TOAD”) Reforms**

The DOS OPP Removals are the result of specific changes and reforms with respect to the TOAD Project. The AESO is proposing to eliminate duplication, address conflicts and gaps and improve clarity among and within its three authoritative document domains: the ISO rules, the ISO tariff and the Alberta Reliability Standards. Information on the TOAD project can be found on the AESO website at [www.aeso.ca](http://www.aeso.ca).

### **Elimination of Duplication in the ISO Tariff**

OPP 507 and OPP 901 were reviewed in conjunction with the ISO tariff. The AESO was of the view that the authoritative components of OPP 507 and OPP 901 were appropriately and adequately contained in the ISO tariff. In an effort to avoid unnecessary duplication, the AESO proposed that these components form part of the proposed 2010 ISO tariff.

The AESO also proposed the removal of certain limited use Section G1 defined terms that only appear in OPP 507.

The proposed effective date for the DOS OPP Removal was originally proposed to be April 15, 2010, but has now been changed to be concurrent with the approved effective date of the 2010 ISO tariff.



## AESO Reply to Stakeholder Comments

The AESO is required to provide a reply to market participant comments pursuant to Section 8 of the Alberta Utilities Commission (“Commission”) Rule 017. [Click here](#) to access the comment-reply matrix for the OPP Removals.

As outlined above, the proposed removal of OPP 507 - Demand Opportunity Service (DOS) Request - and OPP 901 - Demand Opportunity Service (DOS) Curtailments - eliminates overlap with similar provisions in the current ISO tariff and the proposed 2010 ISO tariff. At the time stakeholder consultation commenced on the removal of OPP 507 and OPP 901, the AESO had not yet filed the proposed 2010 ISO tariff nor was a recent draft available for stakeholders. Stakeholders commented that not all of the authoritative provisions were in the current ISO tariff and because the proposed 2010 ISO tariff was not available, stakeholders could not confirm whether all of the authoritative provisions were appropriately contained in the ISO tariff.

As of this date the AESO is providing a detailed reply to the stakeholder comments that specifically set out how each provision was transitioned with regard to the proposed 2010 ISO tariff. The posting of the AESO reply now aligns with the March 4, 2010 filing with the Commission of the proposed ISO 2010 tariff. Stakeholders can now confirm that all of the necessary authoritative provisions are contained within the proposed ISO 2010 tariff.

In light of the above, after careful consideration of the comments received from market participants, the AESO has determined that the DOS OPP Removals will continue as proposed.

Please also note that no written comments were received by the AESO on the proposed removal of certain limited use Section G1 defined terms that only appear in OPP 507.

For ease of reference, the following Table is hyperlinked to provide assistance in directing stakeholders to the summary of the DOS OPP Removals and attachments. The attached summaries provide more information on the DOS OPP Removals, including a brief explanation of the reason why these OPPs should be removed.

Rule Number	Description	Level	Most relevant stakeholder interest
G1	<a href="#">Definitions (removed)</a>	II	All Market Participants
OPP 507	<a href="#">Demand Opportunity Service (DOS) Request</a>	II	All Market Participants
OPP 901	<a href="#">Demand Opportunity Service (DOS) Curtailments</a>	II	All Market Participants



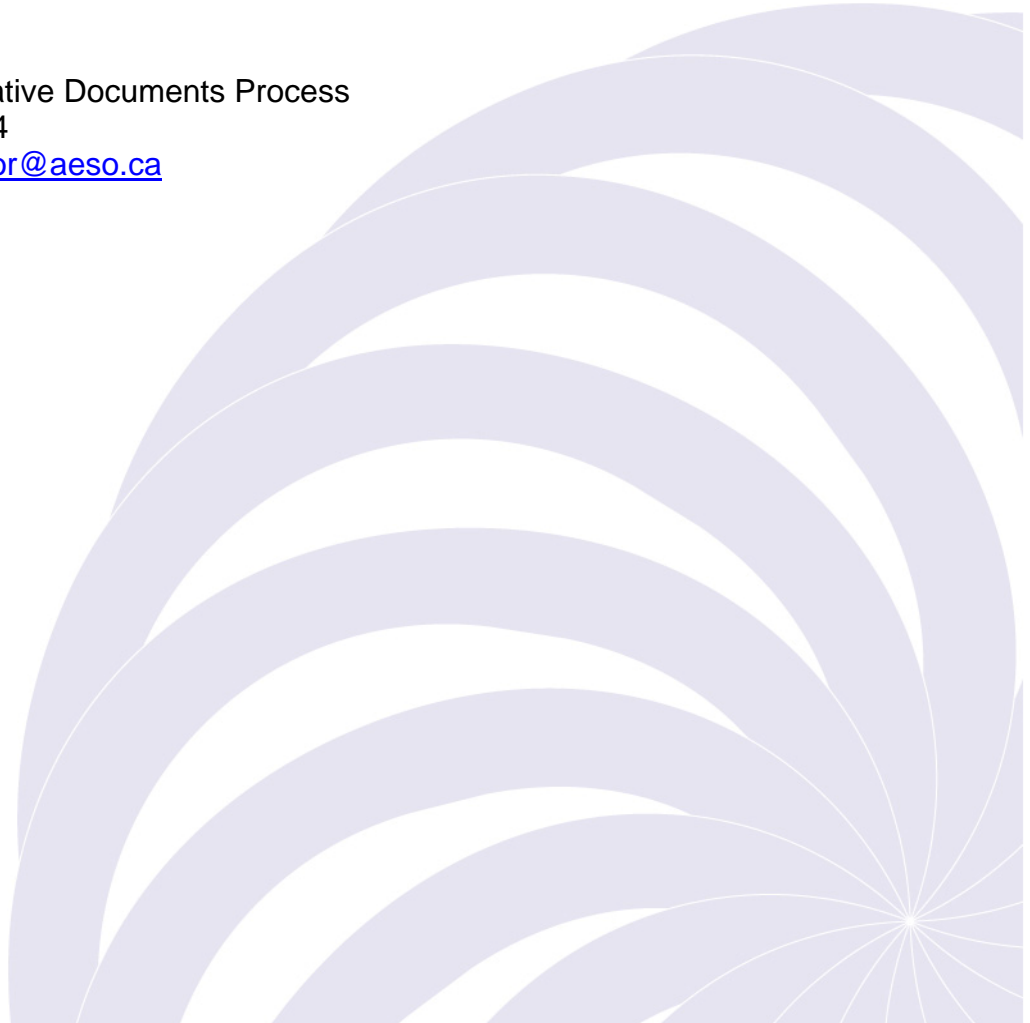
Pursuant to Section 9 of Commission Rule 017, please note the following:

1. The AESO will be filing the OPP Removals with the Commission on March 29, 2010.
2. Market Participants, as defined in the *Electric Utilities Act* (“EUA”), may object to an ISO rule filed with the Commission within 10 days of the publication by the Commission of the notice of filing of the ISO rule, in accordance with Section 20.4 of the EUA; and
3. The proposed effective date for the DOS OPP Removal was originally proposed to be April 15, 2010, but has now been changed to be concurrent with the approved effective date of the 2010 ISO tariff, in accordance with Section 20.3 of the EUA.

Yours sincerely,

*“original signed by”*

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## Final Proposed LEVEL II ISO Rule Changes

Level II changes are changes that are expected to have a moderate or low impact on the industry or the ISO, and generally require little or no effort by stakeholders for implementing a solution. They are provided to stakeholders to review to ensure that the expected impact is reasonable, to identify unrealized impacts and/or to provide notice of the potential change in administrative processes.

<b>ISO Rule Section G1 Definitions (removed)</b>	
Rule Section/Number	Removal of G1 Definitions: <ul style="list-style-type: none"> <li>• DOS request</li> <li>• opportunity capacity</li> </ul>
Summary of ISO Rule	
Reason for Removal	The AESO also proposes to remove certain definitions because they are only used in OPP 507 and no longer needed once the OPP is removed.
Level	II
Explanation of Confidentiality	None
Proposed Effective Date	Concurrent with the approved effective date of the 2010 ISO tariff.
AESO Contact	Regulatory Services, Evelyn Kelly, <a href="mailto:evelyn.kelly@aeso.ca">evelyn.kelly@aeso.ca</a> , (403) 539-2468
Attachments	<b>See attached:</b> <a href="#">Final G1 Definitions to be Removed</a>



**OPP 507 Removal – Demand Opportunity Service (DOS) Request**

Rule Section/Number	Part 3, OPP 507 Demand Opportunity Service (DOS) Request
Summary of ISO Rule	OPP 507 defines the operating policies for customers requesting demand opportunity service (“DOS”) and the policies and procedures for the System Controller when processing a request for DOS.
Reason for Removal	The AESO proposes to remove OPP 507 as unnecessary duplication. The authoritative components of OPP 507 are appropriately contained in the ISO tariff and will remain as part of the proposed 2010 ISO tariff.
Level	II
Explanation of Confidentiality	None
Proposed Effective Date	Concurrent with the approved effective date of the 2010 ISO tariff.
AESO Contact	Regulatory Services, Evelyn Kelly, <a href="mailto:evelyn.kelly@aeso.ca">evelyn.kelly@aeso.ca</a> , (403) 539-2468
Attachments	<b>See attached:</b> <a href="#">Rationale Document for final Removal of OPP 507</a>



**OPP 901 Removal Demand Opportunity Service (DOS) Curtailments**

Rule Section/Number	Part 3, OPP 901 Demand Opportunity Service (DOS) Curtailments
Summary of ISO Rule	OPP 901 defines the policies to be followed by demand opportunity service (“DOS”) customers and Transmission Facility Owners, and the policies and procedures to be followed by the System Controller, in curtailing DOS load.
Reason for Removal	The AESO proposes to remove OPP 901 as the authoritative components of OPP 901 are appropriately contained in the approved ISO tariff and will remain as part of the proposed 2010 ISO tariff.
Level	II
Explanation of Confidentiality	None
Proposed Effective Date	Concurrent with the approved effective date of the 2010 ISO tariff.
AESO Contact	Regulatory Services, Evelyn Kelly, <a href="mailto:evelyn.kelly@aeso.ca">evelyn.kelly@aeso.ca</a> , (403) 539-2468
Attachments	<b>See attached:</b> <a href="#">Rationale Document for final Removal of OPP 901</a>