



July 6, 2010

To: Alberta Utilities Commission (“AUC” or “Commission”)

Re: Notice of Filing – Proposed Level II “Package 5” Amendments to ISO Rule Definitions (“ISO Rules Definitions Changes”) Previously consulted on as Proposed Level II “Package 3” Amendments to and Removal of Existing ISO Rule Definitions

1. The Alberta Electric System Operator (“AESO”) is filing the attached ISO rules definitions pursuant to Section 20.2(1) of the *Electric Utilities Act* (“EUA”). The AESO is authorized to make ISO rules, including Operations Policies and Procedures (“OPPs”), in accordance with Sections 19 and 20 of the EUA.
2. The ISO Rules Definitions Changes are considered by the AESO to be Level II Changes. Level II Changes are changes that are expected to have a moderate or low impact on the industry and/or the AESO, and generally require little or no effort by stakeholders in implementing a solution.

“Package 5” ISO Rule Definitions to be Amended

3. Amendments are proposed to the definitions for the following ISO rules terms:
 - apparent power
 - metered demand
 - metered energy
 - power factor
 - real power, and
 - reactive power.

Transition of Authoritative Documents (“TOAD”) Reforms

4. The ISO Rules Definitions Changes are the result of specific changes and reforms with respect to the TOAD Project. The AESO is seeking 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.

Summary of AESO Consultations

5. On January 28, 2010, the AESO issued a [Letter of Notice](#) requesting comments from market participants and interested parties regarding the “Package 3” Amendments to and Removal of Existing ISO Rules Section G1 Definitions.
6. On February 24, 2010, the AESO posted the [Stakeholder Comments](#) received in response to the January 28, 2010 Letter of Notice. The AESO considered all written

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comments received and determined that additional changes to the above-identified definitions previously consulted on as part of the January 28, 2010 "Package 3" G1 Definitions Changes was warranted.

7. On May 7, 2010 the AESO issued a [Letter of Notice](#) requesting comments from market participants and interest parties regarding "Package 5" Amendments to ISO Rule Section G1 Definitions previously issued for consultation as part of the "Package 3" Definitions Changes. No stakeholder comments were received on the May 7, 2010 Letter of Notice.

Summary of Amendments

8. Please see the AESO's January 28, 2010 Letter of Notice for a summary of the ISO rules definitions previously consulted on as part of the January 28, 2010 "Package 3" G1 Definitions Changes.
9. Please see the AESO's May 7, 2010 Letter of Notice for a summary of the ISO Rules Definitions Changes.

AESO Reply to Stakeholder Comments

10. In accordance with Section 8 of AUC Rule 017, the AESO is required to provide a reply to stakeholder comments received regarding al "draft ISO rules".
11. On March 15, 2010, the AESO posted its reply to comments received from stakeholders in response to the January 28, 2010 Letter of Notice on the AESO website.
12. On June 10, 2010, the AESO posted its reply to comments received from stakeholders in response to the May 7, 2010 Letter of Notice on the AESO website. Please note that no written comments were received by the AESO on the ISO Rules Definitions Changes as set out in the AESO's May 7, 2010 Letter of Notice.

Attachments to Notice of Filing

13. In accordance with Section 13 of Commission Rule 017, the following documents are attached to this Notice of Filing:
 - a) Previous Letters of Notice, Stakeholder Comments and AESO Replies*:
 - i) [Letter of Notice](#) dated January 28, 2010 that was forwarded to market participants and interested parties the AESO considered likely to be affected by the "Package 3" G1 Definition Changes and that was posted on the AESO web site on January 28, 2010;
 - ii) [Stakeholder Comments on the January 28, 2010 Letter of Notice](#) posted on the AESO web site February 24, 2010, setting out the written

comments received, the name of the market participant or other parties who submitted each comment and the date on which the comment was submitted;

- iii) [AESO Reply Letter](#) dated March 15, 2010 that was posted on the AESO web site on March 15, 2010;
 - iv) [Letter of Notice](#) dated May 7, 2010 that was forwarded to market participants and interest parties the AESO considered likely to be affected by the "Package 5" Amendments to ISO Rule Section G1 Definitions and that was posted on the AESO website on May 7, 2010;
 - v) [AESO Reply Letter](#) dated June 10, 2010 that was posted on the AESO website on June 10, 2010 which confirmed that no comments were received from market participants or interest parties on the "Package 5" Amendments to ISO Rule Section G1 Definitions;
- b) [Blacklined](#) and [clean](#) copies of the ISO Rules Definitions Changes; and
 - c) A [comparison table](#) of the ISO Rules Definitions Changes for convenience of reference, which includes the filed amendments.

* Please be advised that certain of the attachments noted above include reference to other ISO rules definitions that are not the subject of this filing.

Proposed Effective Date

- 14. The AESO proposes that the above-filed ISO Rules Definitions Changes take effect on July 23, 2010
- 15. The AESO submits that the filed ISO Rules Definitions Changes complies with AUC Rule 017 and further submits that it is not technically deficient, that it supports the fair, efficient and openly competitive operation of the market and that it is in the public interest.

Yours sincerely,

<original signed by>

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Attachments