

December 7, 2011

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

**Re: Notice of Filing – Final Proposed Alberta Reliability Standard:
Interconnection Reliability Operations and Coordination *Reliability Coordination
Responsibilities and Authorities* IRO-001-AB-1.1.
 (“Final Proposed IRO-001-AB-1.1”)**

1. The Alberta Electric System Operator (“AESO”) is forwarding and recommending that the Commission approve attached Final Proposed IRO-001-AB-1.1 for application as an Alberta Reliability Standard pursuant to Section 19 of the *Transmission Regulation*.
2. All reliability standards proposed for approval or rejection by the AESO are based on the reliability standards and definitions developed, or approved, and enforced by the North American Electric Reliability Corporation (“NERC”). NERC was certified as the Electric Reliability Organization (“ERO”) for the United States by the Federal Energy Regulatory Commission (“FERC”) under the US *Energy Policy Act of 2005*. NERC has been granted recognition as the ERO by the Minister of Energy in Alberta pursuant to Section 20 of the *Transmission Regulation*.
3. In accordance with Section 19 of the *Transmission Regulation*, the reliability standards that apply in Alberta are those of the ERO or any other reliability standards to the extent that such reliability standards are adopted by the AESO after consultation with market participants and after receipt of Commission approval.

Applicability

4. Final Proposed IRO-001-AB-1.1 is applicable to the AESO.

Summary of Final Proposed IRO-001-AB-1.1

5. The purpose of Final Proposed IRO-001-AB-1.1 is to define the criteria by which the ISO must comply with directives issued by the Western Electricity Coordinating Council (“WECC”) Reliability Coordinator.

Summary of AESO Consultation

6. On August 17, 2010, the AESO posted on its website and into its stakeholder newsletter a [Letter of Notice](#) requesting comments from interested parties and market participants that the AESO considered likely to be directly affected by the proposed adoption of IRO-001-AB-1 *Reliability Coordination Responsibilities and Authorities*.
7. On September 21, 2010 the AESO posted the [Stakeholder Comments](#) received in response to the August 17, 2010 Letter of Notice. The AESO considered all written comments received, and made further amendments to proposed IRO-001-AB-1. On November 24, 2011, the AESO posted its [replies](#) to written stakeholder comments received on the August 17, 2010 Letter of Notice and attached “Final Proposed IRO-001-AB-1.1”.
8. During the AESO’s consultation on proposed IRO-001-AB-1, the NERC Board of Trustees approved NERC IRO-001-1.1 *Reliability Coordination Responsibilities and Authorities* replacing existing NERC EOP-001-1 *Reliability Coordination Responsibilities and Authorities*. The AESO re-numbered the

Alberta reliability standard as version 1.1, to align with NERC IRO-001-1.1. The only difference between NERC IRO-001-1 and NERC IRO-001-1.1 is that NERC included errata changes and the removal of wording in the effective date section in NERC reliability standard version 1.1. Accordingly, as NERC IRO-001-1.1 resulted in no changes to proposed IRO-001-AB-1.1, the AESO decided to align the numbering of Final Proposed IRO-001-AB-1.1 with NERC IRO-001-1.1.

9. Furthermore, during the AESO's consultation on proposed IRO-001-AB-1 (now Final Proposed IRO-001-AB-1.1), the NERC Board of Trustees approved NERC standard IRO-001-2 *Reliability Coordination – Responsibilities and Authorities* on August 4, 2011. The AESO is aware that NERC has approved IRO-001-2 and will conduct a review of the NERC reliability standard for adoption in Alberta at a future date.

Changes to Final Proposed IRO-001-AB-1.1

10. Please see the AESO's August 17, 2010 Letter of Notice for a summary of proposed IRO-001-AB-1.
11. Please see the AESO's November 24, 2011 Reply Letter that identified further amendments to proposed IRO-001-AB-1 as attached to the AESO's August 17, 2010 Letter of Notice.

Attachments to Notice of Filing

12. The following documents are attached to this Notice of Filing:
 - a) [Letter of Notice](#) dated August 17, 2010, forwarded to interested parties and market participants that the AESO considers likely to be directly affected by the proposed adoption of IRO-001-AB-1, and which was posted on the AESO website on August 17, 2010.
 - b) [Stakeholder Comments](#) on the August 17, 2010 Letter of Notice posted on the AESO website on September 21, 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;
 - c) [AESO Reply Letter](#) posted on the AESO website on November 24, 2011; and
 - d) [Clean](#) copy of Final Proposed IRO-001-AB-1.1 *Reliability Coordination Responsibilities and Authorities*.

Proposed Effective Date

13. The AESO proposes that Final Proposed IRO-001-AB-1.1 become effective on October 1, 2012.
14. The AESO submits that Final Proposed IRO-001-AB-1.1 complies with the requirements of the *Transmission Regulation*, is not technically deficient, and is in the public interest.

Yours sincerely,

<original signed by>

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Attachments