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October 2, 2007

Cliff Monar
Vice-President, Market Services
Alberta Electric System Operator
2500, 330-5 Avenue
Calgary, Alberta T2P 0L4

Dear Cliff,

**RE: CURRENT SOLUTIONS INCORPORATED (“CSI”) COMMENTS REGARDING PROPOSED
CONGESTION MANAGEMENT PLAN**

Thank you for the opportunity of expressing the views of CSI regarding the AESO's recommended Congestion Management paper dated August 30, 2007. The feedback from CSI is based upon the paper, comments made by the AESO and stakeholders during the AESO's stakeholder session and further conversations with AESO staff. These comments are made on behalf of Industrial customers that are represented by CSI.

CSI believes that all customers need to be treated fairly, in a non-discriminatory manner, regardless of their load size, or how long they have been operating. New customers and new loads should have the same standard of service and treatment as older customers and more established loads. Based on these underlying principles, at a “high level” CSI is in favour of the AESO's proposed Congestion Management Plan. That said, many details and clarifications are required before CSI can give its formal support to the AESO's proposal.

CSI is primarily concerned over the treatment of loads in the congestion management process, specifically in areas of the province that are currently constrained due to lack of adequate transmission. More specifically, CSI is concerned over the AESO's paper regarding RAS schemes and the impact these schemes may have on the real time congestion management plan proposed by the AESO.

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REMEDIAL ACTION SCHEMES

The paper states that a RAS program may be implemented to enable a new participant to be connected to the system, where they would otherwise not be allowed to connect. A RAS trigger participant would be notified in their interconnection proposal that a scheme is required and under which conditions the customer may be triggered off the system. While the AESO desires to follow the principle that no load or generator has “transmission rights”, the only time that a new participant is not to be granted equal access to the transmission system is where the participant accepts a RAS proposal from the AESO.

It is the understanding of CSI that the management of the RAS scheme is separate from the management of real time congestion. Therefore, to manage congestion in a region, the AESO will not rely upon the RAS scheme but will follow the real time congestion management protocol.

CSI seeks clarification from the AESO on the AESO’s planning group’s use of RAS. Is it the intent of the AESO to minimize the use of RAS and maximize the use of the real time congestion management protocol? For example, the AESO planners will only use RAS in circumstances where the real time congestion management protocol cannot be utilized. For example, RAS will be implemented when it is not possible for the system operator to respond to a specific contingency within a reasonable timeframe.

We look forward to your clarification over these issues and to working with you on an ongoing basis to develop a workable solution to power supply in the province.

Yours truly,

A handwritten signature in blue ink, appearing to read 'J. Shand', is written over a horizontal dashed line.

Jamie Shand, President
CURRENT SOLUTIONS INCORPORATED

c: Ed de Palezieux
Colin Carlsen
Doug Simpson