



July 7, 2009

**To: Alberta Utilities Commission (“Commission”)**

**Re: ISO Rule Filing in Compliance with Decision 2009-007 Long Lead Time Energy Dispatch and Directives, Decision 2009-007 Alberta Electric System Operator, Objections to ISO Rule 6.3.5, 6.3.6 and Appendix 7 Long Lead Time Energy Dispatches and Directives, January 19, 2009, Applications 1567942, 1577529, 1577530, 1577532, Proceeding ID. 33**

In response to directions in Decision 2009-007<sup>1</sup> the Alberta Electric System Operator (“AESO”) encloses amendments to the Long Lead Time Energy Dispatches and Directives (“LLTD Rules”) for filing with the Alberta Utilities Commission (the “Commission”).

An earlier version of proposed changes to the LLTD Rules was first filed with the Commission on April 10, 2008. In response to stakeholder objections, the Commission convened a public hearing and on January 19, 2009 issued Decision 2009-007, which directed modifications to the proposed LLTD Rules. The directions to the AESO were summarized in Decision 2009-007 as follows:<sup>2</sup>

Pursuant to subsection 20.5(1)(c) of the EUA, and with respect to the LLTD Rule, the Commission directs the ISO to:

- (a) Provide an update as to the status of OPP 705 and OPP 801 at the time it re-files the LLTD Rule;
- (b) Clarify that the circumstances in which the LLTD Rule would be used are reasonably limited to situations as contemplated in subsections 18(1)(a) and 18(1)(b) of the *Transmission Regulation*;
- (c) Provide a definition of “incremental generation costs” applicable to the LLTD Rule;
- (d) Revise the LLTD Rule to reflect the AESO’s stated intent that a generator that opts out of the directive at any point prior to being directed off forfeits rights to compensation for costs it would not have incurred absent the directive.
- (e) Consider the technical compensation issue raised by ENMAX when developing a definition of “incremental generation costs” applicable to the LLTD Rule;
- (f) Revise the LLTD Rule in a manner that allows for compensation to be directed to the impacted party if a long lead time directive is issued as discussed in section 4.6; and

---

<sup>1</sup> Alberta Electric System Operator, Objections to ISO Rule 6.3.5, 6.3.6 and Appendix 7 Long Lead Time Energy Dispatches and Directives, January 19, 2009.

<sup>2</sup> Decision 2009-007, paragraph 170.



(g) Provide a reporting mechanism that should include mandatory items that describe the circumstances that caused and related to a long lead time directive and reflect the reporting requirements contained in the AESO's Argument.

The Commission noted that the revisions the AESO was directed to make would benefit from consultation with market participants.<sup>3</sup> On March 5, 2009 the AESO issued a Letter of Notice regarding amended LLTD Rules incorporating the directions from the Commission's Decision 2009-007. On June 19, 2009 the AESO posted its Reply to comments received from stakeholders in response to the Letter of Notice.

The revised LLTD Rules will come into effect pursuant to subsection 20.5(4)(c) of the *Electric Utilities Act* when the Commission is satisfied that the AESO has incorporated the Commission's directions in Decision 2009-007.

Consequential amendments to OPP 101, OPP 705 and OPP 801, collectively the "OPP Rule Changes", were not part of the Commission's directions in Decision 2009-007 but are necessary in order to implement the LLTD Rules. In addition to the LLTD Rules, the March 5, 2009 Letter of Notice also included the OPP Rule Changes for a separate consultation process pursuant to Commission Rule 017. The AESO's June 19, 2009 Reply to stakeholder comments also provided a response to stakeholder comments concerning the OPP Rule Changes. Today (July 7, 2009), the AESO also filed the consequential OPP Rule Changes with the Commission. Click [here](#) to view the filed consequential OPP Rule Changes.

In addition to the attached [blacklined](#) and [clean](#) versions revised LLTD Rules, the AESO also attaches the March 5, 2009 [Letter of Notice](#) that was sent to market participants and posted on the AESO web site on March 5, 2009, and the June 19, 2009 [Final Proposed Changes](#) letter with the AESO's Reply to stakeholder comments that was sent out to market participants and that was posted on the AESO web site on June 19, 2009.

Yours sincerely,

*Original Signed By*

Paul Glatthor  
Senior Coordinator, Rules  
Ph: (403) 539-2464  
E-mail: [paul.glatthor@aeso.ca](mailto:paul.glatthor@aeso.ca)

Attachments

---

<sup>3</sup> Decision 2009-007, paragraph 173.