



September 15, 2009

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

**Re: Notice of Filing –Changes to Existing G1 Definitions for “Agent”**

1. The Alberta Electric System Operator (“AESO”) is filing ISO rules 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 (“OPP”) in accordance with Sections 19 and 20 of the EUA.
2. Level I changes are changes that have a significant operational or financial impact on the industry or the AESO.

### **Background**

3. On August 27, 2009, the Alberta Electric System Operator (“AESO”) filed Level I Changes to Existing ISO Rule 1.8 “Appointment of Agent” and removal of ISO rule 1.10 “Market Participant Behavior Guidelines” that were required to implement the Fair, Efficient and Open Completion Regulation (the “FEOC Regulation”) pursuant to Section 20.2(1) of the EUA.
4. On September 1, 2009 the Commission posted its Notice of Filing of ISO Rules and Notice for Objection regarding ISO Rule 1.8 “Appointment of Agent” and removal of ISO rule 1.10 “Market Participant Behavior Guidelines” that were required to implement the FEOC Regulation (“Commission Notice of Filing”). The Commission Notice of Filing was limited to the ISO Rules and did not include the proposed changes to the definition of “agent” (the “Definition”) in Section G1 of the ISO rules, as it was Commission’s position that the notice of filing submitted by the AESO did not specifically identify that the Definition was filed as part of that filing.

### **Summary of Amendments**

5. On June 26, 2009, the AESO issued a Letter of Notice requesting comments from market participants and interested parties regarding proposed Level I Changes to ISO Rules 1.8 Appointment of an Agent and Removal of ISO Rule 1.10 Market Participant Behaviour Guidelines that were required to implement the FEOC Regulation. This letter of notice also included a proposed change to the Definition. On July 28, 2009 the AESO posted the comments received from stakeholders, which included comments on the Definition. On August 12, 2009 the AESO posted the AESO’s Reply to the comments which also included the comments received on the Definition. No objections to ISO rule 1.8 and the removal of ISO rule 1.10 were filed.



6. As indicated in the June 26, 2009 Letter of Notice, the Definition in Section G1 of the ISO rules is being updated:
  - a) specifically with respect to ISO rule 1.8, to clarify that the subject responsibilities are of a pool participant not a market participant; and
  - b) to incorporate a more general definition of “agent” that the AESO may use for other rule purposes in the future. The latter is simply a placeholder definition, and will be the subject of specific application or procedure elaborations when used in an ISO rule at some future point in time.

#### **Attachments to Notice of Filing**

7. In accordance with Section 13 of Commission Rule 017, please find the following attached to this Notice of Filing:
  - a) The [Letter of Notice](#) that was sent to market participants that the AESO considers likely to be affected by these changes and that was originally posted on the AESO web site on June 26, 2009. Please note that the AESO has not issued any previous Letters of Notice regarding these changes;
  - b) The [Stakeholder Comments on Letter of Notice](#) with written comments received, the name of market participants that submitted each comment in response to the Letter of Notice and the date on which the comment was submitted and was posted on the AESO web site on July 28, 2009. Please note that the table title should read “Proposed Level I Changes to ISO Rule 1.8 “Appointment of Agent” and removal of ISO rule 1.10 “Market Participant Behavior Guidelines” that were required to implement the Fair, Efficient and Open Completion Regulation (the “FEOC Regulation”);
  - c) [AESO Reply](#) to comments received and the date of the Reply that the AESO considers likely to be affected by these changes and that was posted on the AESO web site on August 12, 2009, including any comments on the Definition; and
  - d) Copies of filed revised Definition ([blacklined](#) and [clean](#)).

#### **Proposed Effective Date**

8. The AESO proposes that the above-filed changes to the Definition in Section G1 of the ISO rules take effect on October 1, 2009.



9. The AESO submits that the filed changes to the Definition in Section G1 of the ISO rules complies with Commission Rule 017 made under Section 20.9 of the EUA, and that it is not technically deficient, supports the fair, efficient and openly competitive operation of the market and is in the public interest.

Yours sincerely,

*Original Signed By*

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Attachments