



July 7, 2009

To: Alberta Utilities Commission (“Commission”)

Re: Notice of Filing – Final Proposed Level I Amendments to OPP 101, OPP 705, OPP 801

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.

Summary of Amendments

3. On March 5, 2009 the AESO issued a Letter of Notice regarding proposed amendments to Long Lead Time Energy Dispatch and Directives (“LLTD Rules”) incorporating the directions from the Alberta Utilities Commission (the “Commission”) Decision 2009-007. On June 19, 2009 the AESO posted its Reply to comments received from stakeholders in response to the Letter of Notice and today (July 7, 2009) the AESO filed the final LLTD Rules with the Commission. Click [here](#) to view the filed final LLTD Rules. 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.
4. Consequential amendments to OPP 101, OPP 705 and OPP 801, collectively the “OPP Rule Changes”, 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.
5. This Notice of Filing pertains to the OPP Rule Changes, which are summarized below.

OPP 101 Dispatching the Energy Market Merit Order and DDS Merit Order

6. OPP 101 defines the methodology used by the System Controller (SC) when dispatching bids and offers in the energy market merit order under normal operating conditions.



7. The amendments to OPP 101 are required to implement the proposed amendments to ISO Rules on dispatch down service (DDS) with respect to long lead time (LLT) energy directives.

OPP 705 Short Term Adequacy Assessment

8. OPP 705 defines the policy and procedures for the System Controller when determining the short-term adequacy of available supply to meet the Alberta Interconnected Electric System demand requirements and requesting for or directing available supply.
9. The proposed amendments to OPP 705 are required to implement the proposed amendments to ISO Rule 6.3.5 Long Lead Time Energy.
10. OPP 705 has confidential Tables 2 and 3 that provide a list of aggregated assets with long lead times greater than one hour and behind-the-fence load supplied by on-site generation, which is considered privileged information by the customers. The AESO requests the Commission confirm that disclosure of confidential Tables 2 and 3 attached to OPP 705 would not be in the public interest.

OPP 801 Supply Shortfall

11. OPP 801 defines procedures to follow and measures to be taken when responding to supply shortfall in Alberta in order to maintain system reliability.
12. The proposed amendments to OPP 705 are required to implement the proposed amendments to ISO Rule 6.3.5 Long Lead Time Energy.
13. OPP 801 has Tables 2 through 5 that contain information on generation levels, station service loads, voluntary curtailment loads and phone numbers. This information is considered privileged information by the generators and customers. No changes were made to the confidential Tables attached to OPP 801 and consequently they are not attached.

Attachments to Notice of Filing

14. 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 posted on the AESO web site on March 5, 2009. Please note that the AESO has not issued any previous Letters of Notice regarding these changes;



- b) The [Stakeholder Comment on Letter of Notice](#) letter with written comments received, the name of market participants or other persons who submitted each comment in response to the Letter of Notice and the date on which the comment was submitted that was sent to market participants that the AESO considers likely to be affected by these changes and that was posted on the AESO web site on April 9, 2009;
 - c) The [Final Proposed Changes](#) letter with the AESO's 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 June 19, 2009; and
 - d) Copies of the following filed OPPs:
 - i) OPP 101 ([blacklined](#) and [clean](#))
 - ii) OPP 705 ([blacklined](#) and [clean](#))
 - iii) OPP 801 ([blacklined](#) and [clean](#))
15. Blacklined and clean copies of confidential Tables 2 and 3 to OPP 705 are not attached and will be forwarded to the Commission under separate cover.

Proposed Effective Date

- 16. The AESO proposes that the above-filed OPPs take effect on September 1, 2009.
- 17. The AESO submits that the filed OPPs comply with Commission Rule 017 made under Section 20.9 of the EUA, are not technically deficient, support the fair, efficient and openly competitive operation of the market and are in the public interest.

Yours sincerely,

Original Signed By

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Attachments