

Information documents are not authoritative. Information documents are for information purposes only and are intended to provide guidance. In the event of any discrepancy between an information document and any authoritative documents¹ in effect, the authoritative documents govern.

1 Purpose

The purpose of this information document is to provide guidance on the process of making a request to the AESO for information regarding the requirements of an authoritative document. Guidance on requests for a waiver or variance from the requirements of an authoritative document can be found in Information Document #2020-007, *Waivers and Variances Requests*.

2 Requests for Information

The request for information process is intended to provide an opportunity for a market participant to seek clarification of any authoritative content that is not clearly worded or clarification of how to deal with a situation that is not contemplated by authoritative content.

2.1 Communication Regarding Requests for Information

Unless the AESO specifies otherwise, market participants may send a request for information to rfi@aeso.ca.

2.2 Requests for Information Related to Proposed Authoritative Documents

Where a market participant seeks information relating to the requirements of a proposed new or amended authoritative document, the AESO recommends the market participant participate in the related stakeholder engagement process.

Where a market participant seeks information relating to the requirements of a proposed new or amended authoritative document that has been filed with the Alberta Utilities Commission ("AUC"), the AESO recommends the market participant participate in the AUC's review process.

2.3 Review of Published Information

The AESO endeavors to ensure that requirements in authoritative documents are as clear as possible. The AESO publishes information documents in order to provide further clarity and relevant information. Market participants are expected to review information documents thoroughly and consider their own unique circumstances to determine if and how requirements apply to them. After completing that review, if market participants are of the view that the published information is incomplete or unclear, they may submit a request for information.

2.4 Response Timelines

The AESO conducts an appropriate review of the particular facts and circumstances related to each request and therefore, the response time for any particular request will vary. The AESO may respond to some requests in a relatively short period while others may take longer due to reasons such as the completeness of the information submitted in support of the request, the complexity of the associated issues, and the quantity of requests being considered by the AESO at any given time.

¹ "Authoritative documents" is the general name given by the AESO to categories of documents made by the AESO under the authority of the *Electric Utilities Act* and regulations, and that contain binding legal requirements for either market participants or the AESO, or both. AESO authoritative documents include: the ISO rules, the reliability standards, and the ISO tariff.

2.5 Meetings with the AESO

The AESO or a market participant may request a meeting, in person or by teleconference, to discuss a request for information, or to ask questions about an AESO response to a request. Depending on the nature of the matter, the AESO may decline the request.

2.6 Requests not covered by this Request for Information Process

The AESO does not provide requested information if a request falls into one or more of the following categories:

- (a) requests for the AESO's opinion regarding whether or not a market participant's actions will be deemed compliant for the purpose of compliance monitoring activities;
- (b) requests for the AESO to complete an analysis or provide an interpretation of whether and how an authoritative requirement may apply to a market participant's specific circumstances or facilities; or
- (c) requests for information that is confidential or commercially sensitive information.

In the case of (b), for example, the AESO is of the opinion that the definition of bulk electric system is clear. The AESO will not review a market participant's single line diagram of its facility and provide an interpretation of whether or not the facility is part of the bulk electric system or not.

2.7 Secure Exchange of Records

In general, the AESO utilizes email to exchange information with a market participant related to a request for information. Upon request, the AESO can utilize SharePoint Online or a mutually acceptable alternative as a secure means to transfer information

2.8 Confidential Information

In accordance with subsections 2(1) and 2(2) of Section 103.1 of the ISO rules, *Confidentiality* ("Section 103.1"), the AESO considers a market participant's name and facility specific information contained in requests for information to be commercially sensitive unless the information is otherwise in the public domain. A market participant may inform the AESO of other information it considers to be commercially sensitive, along with reasons why the information should be treated as confidential.

3 AESO's Evaluation of Requests for Information

3.1 AESO Information Requests

The AESO will review requests along with supplementary information submitted to ensure it has sufficient information to provide its response. The AESO may seek additional information from a market participant. The AESO may set out a date on which the additional information is expected from the market participant in order to proceed with a timely resolution of the request. If the market participant is unable or unwilling to provide the requested information, it is encouraged to respond to the AESO with the reasons why the information will not be provided. The AESO may reject a request, or suspend the review of a request, if a market participant is unable to provide the information necessary for the AESO to provide its response.

3.2 Status Updates

The AESO will endeavor to communicate regularly with the market participant as appropriate. There may be circumstances when the AESO is waiting for information or analysis from the market participant that may involve an extended period. In such cases, the market participant is encouraged to update the AESO on its progress from time-to-time.

3.3 AESO Responses

In order to ensure that the responses provided are transparent and consistent, the AESO may address requests for information relating to the requirements of an authoritative document:

- (a) through an amendment to an information document or development of a new information document;
- (b) by referring to non-confidential information that has already been made public by the AESO;
or
- (c) through an amendment to an authoritative document.

When the AESO determines that a new authoritative document or an amendment to an existing authoritative document may be necessary to address the request for information, the AESO will commence a stakeholder engagement process and inform the market participant that made the request.

In a response to a request for information, the AESO may provide information regarding the requirements of an authoritative document to a market participant directly, but only where the response is determined by the AESO to be of little or no value to other market participants.

4 Compliance Information

The AESO monitors market participant compliance with authoritative documents in accordance with its mandate under Section 17(1.1) of the *Electric Utilities Act* (“EUA”) and Section 23(1) of the *Transmission Regulation*.

If a market participant submits a request for information to the AESO and is concerned that it is not or may not be in compliance with the requirements of an authoritative document while the request is being reviewed by the AESO, it is the market participant’s responsibility to determine the appropriate course of action. Such action may include discussing the matter with its legal advisors or a self-report to the MSA).

The AESO may become aware of suspected non-compliance with authoritative document requirements through the process of reviewing requests for information and an ensuing compliance monitoring investigation. If the AESO determines that a suspected contravention has occurred, it will advise the MSA of the matter.

5 Disclosure to the MSA

Records related to a request for information submitted to the AESO are subject to Section 2 of the *Market Surveillance Regulation*, which requires the AESO, upon request, to make available to the MSA any records relating to a market participant that are held or become available to the AESO pursuant to its mandate under the EUA or any other enactment, including any records that are created by the AESO from records provided by market participants.

6 Freedom of Information and Protection of Privacy

The AESO is a public body subject to the provisions of the *Freedom of Information and Protection of Privacy Act* (“FOIP Act”) and may be required to disclose certain information upon request. Information related to requests for information’s regarding authoritative documents may be requested under the FOIP Act; however, the right of access is not absolute. The FOIP Act recognizes several legitimate reasons to refuse access to information (as outlined in sections 16-29 of the FOIP Act), including harm to business and privacy interests. The AESO is committed to protecting information that qualifies for an exemption. Third parties are active participants in the request process and maintain the right to provide input during the decision-making process and the right to appeal any disclosure decisions.

7 Revision History

Posting Date	Description of Changes
2020-12-17	Added content relating to the purpose of the request for information process and the types of requests for which the AESO

Information Document
Requests for Information Regarding
Authoritative Documents
ID #2017-001



	does not provide the requested information.
2020-10-15	Removed content relating to waiver or variance requests. Reorganized and updated remaining content.
2019-09-03	Amendments to sections 3, 4 and 5; added section 6.
2017-07-20	Added section 2.1 and 6; amendments to sections 3 and 4.
2017-03-21	Administrative amendments to update referenced reliability standards.
2017-02-13	Added response time to section 3; amended section 4.1; and added section 5.
2017-01-27	Initial release.