



Alberta Electric System Operator

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In the Matter of the Need for the Luna Solar+ Project Phase One Connection

And in the matter of the *Electric Utilities Act*, S.A. 2003, c. E-5.1, the *Alberta Utilities Commission Act*, S.A. 2007, c. A-37.2, the *Hydro and Electric Energy Act*, R.S.A. 2000, c. H-16, the Regulations made thereunder, and *Alberta Utilities Commission Rule 007*

Application of the Alberta Electric System Operator for Approval of the
Luna Solar+ Project Phase One Connection
Needs Identification Document

Date: July 7, 2025

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PART A - APPLICATION

1 Introduction

1.1 Application

Pursuant to Section 34(1)(c) of the *Electric Utilities Act* (Act), and in accordance with further provisions set out in legislation,¹ the Alberta Electric System Operator (AESO) applies to the Alberta Utilities Commission (Commission) for approval of the *Luna Solar+ Project Phase One Connection Needs Identification Document* (Application). This application is submitted in accordance with AUC Rule 007, Section 7.1.2, *Abbreviated needs identification document application information requirements*.

1.2 Application Overview

The market participant, Northland Power Luna I GP Inc. (market participant), requested system access service to connect its approved Luna Solar+ Project Phase One (the Facility)² to the transmission system in the Brooks area (AESO Planning Area 47, Brooks). The Facility is comprised of Luna 1 South and Luna 1 North and includes a collector substation, designated as the Apollo 1041S substation. The market participant expects the Facility to be commercially operational in February 2029.

The market participant's request includes a new Rate STS, *Supply Transmission Service*, contract capacity of 200 MW for Luna 1 South and of 265 MW for Luna 1 North and a new Rate DTS, *Demand Transmission Service*, contract capacity of 0.65 MW for Luna 1 South and of 0.85 MW for Luna 1 North. The market participant's request can be met by adding two 240 kilovolt (kV) transmission lines to connect the Facility to the existing 240 kV transmission lines 935L and 923L in a double T-tap configuration (the Proposed Transmission Development, as further described in Section 2.2).

The scheduled in-service date for the Proposed Transmission Development is August 31, 2028.

This Application describes the need to respond to the market participant's request for system access service, and the AESO's determination of the manner in which to respond to the request. Having followed the AESO Connection Process,³ the AESO has determined that the Proposed Transmission Development provides a reasonable opportunity for the market participant to exchange electric energy and ancillary services. The Proposed Transmission Development is consistent with the AESO's long-term plans for the South Planning Region, which includes the Brooks area. The AESO submits this Application to the Commission for approval in accordance with the AESO's responsibility to respond to requests for system access service and having determined that transmission development is required and is in the public interest.^{4,5}

¹ The *Alberta Utilities Commission Act*, S.A. 2007, c. A-37.2, the *Hydro and Electric Energy Act*, R.S.A. 2000, c. H-16, the Regulations made thereunder, and Alberta Utilities Commission Rule 007 (AUC Rule 007).

² Power Plant Approval 28384-D02-2023 and Substation Permit and Licence 28384-D04-2023, Northland Power Luna I GP Inc., Luna Solar+ Project Phase One Application.

³ For information purposes, refer to note iv of Part C of this Application for more information on the AESO Connection Process.

⁴ For information purposes, some of the legislative provisions relating to the AESO's planning duties and duty to provide system access service are referenced in notes i and ii of Part C of this Application.

⁵ Note v of Part C of this Application describes the Application scope in more detail.

1.3 Market Participant Proposal

The market participant submitted a proposal to the AESO, pursuant to Section 24.31 of the *Transmission Regulation* (TReg) (Market Participant Proposal), for the construction and temporary operation of a transmission facility, specifically the Proposed Market Participant Development defined in Section 2.2 below.

A completed Market Participant Proposal was submitted by the market participant on February 13, 2025. Subsequently, on February 21, 2025, the AESO conditionally approved the Market Participant Proposal pursuant to Section 36(1) of the Act, and in accordance with Section 36(2) of the Act, specified the time within which the market participant was to submit, for Commission approval under the *Hydro and Electric Energy Act* (HEEA), a transmission facility proposal (Facility Proposal)⁶ for the Proposed Market Participant Development.

1.4 AESO Directions to the TFO

During the AESO Connection Process, the AESO issued various directions to the legal owner of the transmission facility (TFO), in this case AltaLink Management Ltd., in its capacity as general partner of AltaLink L.P., (AltaLink), including a direction to submit, for Commission approval under the HEEA, a Facility Proposal for the Proposed AltaLink Development, as defined in Section 2.2.⁷

⁶ Also referred to as facility application, or FA, under AUC Rule 007.

⁷ The directions are described in more detail in the following sections of this Application and in Part C, note vi.

2 Need Overview and Proposed Transmission Development

2.1 Duty to Provide Transmission System Access Service

The AESO, pursuant to its responsibilities under Section 29 of the Act, must provide system access service on the transmission system in a manner that gives all market participants a reasonable opportunity to exchange electric energy and ancillary services.

The AESO, in consultation with the market participant and AltaLink, has determined that the Proposed Transmission Development is the preferred option to provide the market participant with a reasonable opportunity to exchange electric energy and ancillary services. In accordance with Section 34 of the Act, the AESO has determined that the Proposed Transmission Development will result in an expansion or enhancement of the capability of the transmission system thereby establishing the need for this Application. The market participant has made the appropriate applications to the AESO to obtain transmission system access service.

Through the AESO Connection Process, the AESO, in consultation with the market participant and AltaLink, has determined the Proposed Transmission Development and has assessed the impacts that the Proposed Transmission Development and the associated generation would have on the Alberta interconnected electric system. ATCO Electric Ltd. (ATCO) has a small scope of work described below (Section 2.2) for which it has determined that a transmission facility proposal is not required.

2.2 Proposed Transmission Development

The Proposed Transmission Development, as shown in Figure 2-1, involves the following elements:⁸

- A. The Proposed Market Participant Development, which includes transmission facilities that, as contemplated by Section 24.31 of the TReg, will be constructed by the market participant, and, thereafter, jointly operated by the market participant and AltaLink for a temporary period of time specified in the Market Participant Proposal;⁹
- B. The Proposed AltaLink Development; and
- C. The Proposed ATCO Development (as defined below)

The scope of the Proposed Market Participant Development and the Proposed AltaLink Development is described further below and shown in Figure 2-1.

⁸ Details and configuration of equipment required for the Proposed Transmission Development are more specifically described in the AESO's Functional Specification included in the AltaLink and market participant's respective Facility Proposals. Also, further details will be determined as detailed engineering progresses and the market participant's operating requirements are finalized. Routing and/or siting of transmission facilities do not form part of this Application and are addressed in the market participant's Facility Proposal. Line numbering and substation names provided here are for ease of reference and are subject to change as engineering and design progresses. The market participant's facilities that may subsequently be connected to the Proposed Transmission Development are the responsibility of the market participant and are not included in the Application.

⁹ Where the AESO approves a proposal per section 24.31(7) of the TReg, the market participant and the incumbent TFO must, (a) before applying for any permit, licence or approval under the HEEA to construct or operate the transmission facility, enter into a written agreement under which ownership of the transmission facility will transfer from the market participant to the incumbent TFO on the expiry of the temporary period referred to in subsection 24.31 (3)(c) of the TReg.

A. The Proposed Market Participant Development:

1. Add one 240 kV circuit, approximately 5 km in length, with a minimum capacity of 480 MVA, to connect the Facility to the existing 240 kV transmission line 935L in a T-tap configuration.
2. Add one 240 kV circuit, approximately 5 km in length, with a minimum capacity of 480 MVA, to connect the Facility to the existing 240 kV transmission line 923L¹⁰ in a T-tap configuration.
3. Modify, alter, add or remove equipment, including switchgear, and any operational, protection, control and telecommunication devices required to undertake the work as planned and ensure proper integration with the transmission system.

B. The Proposed AltaLink Development:

1. Modify, alter, add or remove equipment, including switchgear, and any operational, protection, control and telecommunication devices required to undertake the work as planned and ensure proper integration with the transmission system.¹¹

C. The Proposed ATCO Development:

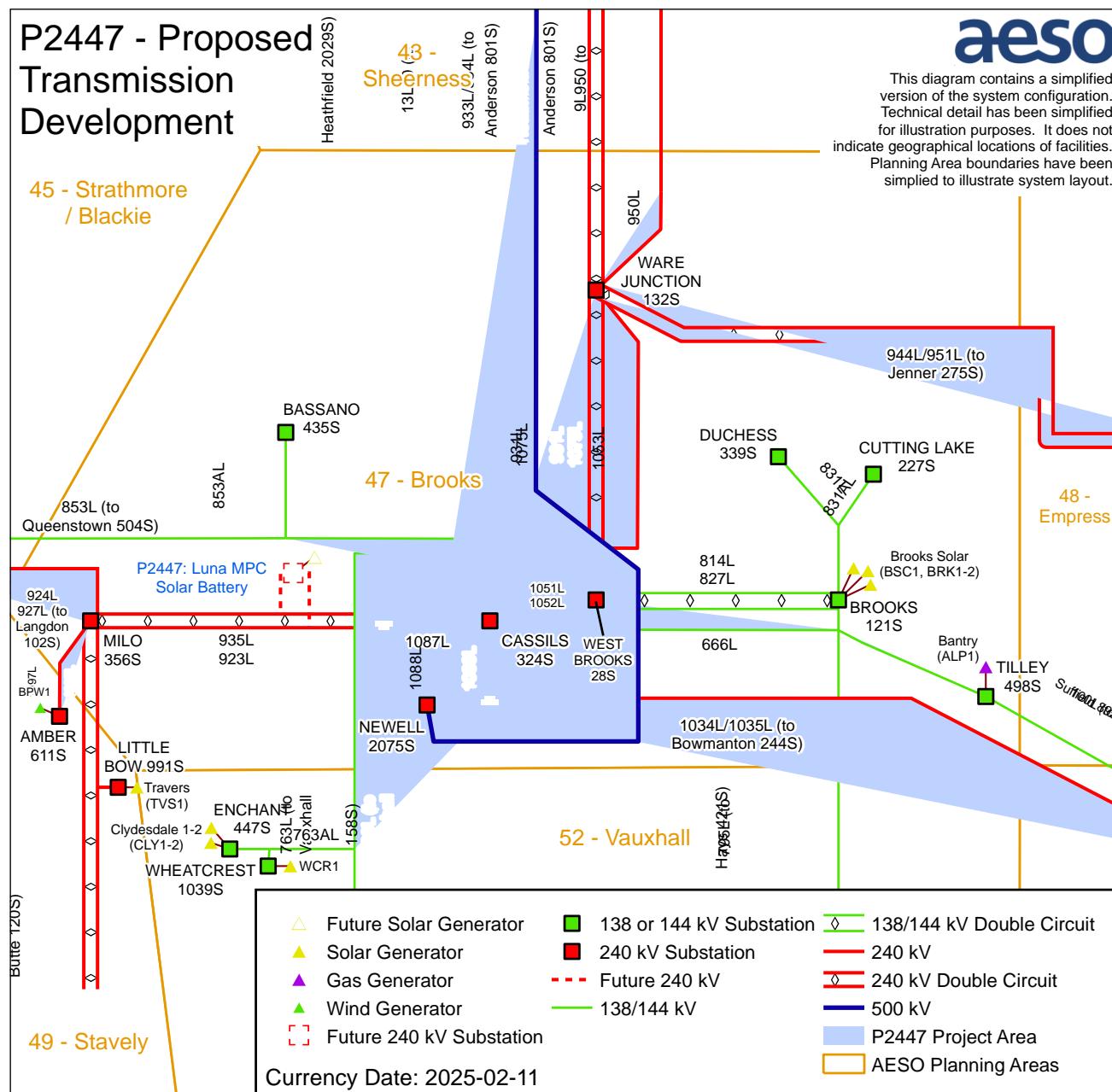
1. Modify, alter, add or remove equipment, including switchgear, and any operational, protection, control and telecommunication devices required to undertake the work as planned and ensure proper integration with the transmission system.¹²

¹⁰ Both 240 kV circuits will connect to the market participant's approved Apollo 1041S substation, which is part of the Facility. Through its detailed routing and siting activities the market participant has estimated that the 240 kV circuits will have a length of approximately 5 kilometres respectively. This is subject to change as routing and/or siting is finalized by the market participant.

¹¹ AltaLink advised the AESO that its scope of work will consist of modifications to the existing 240 kV transmission lines 923L and 935L to facilitate the creation of the T-tap connection, installation of a new telecommunications tower and other protection and control, SCADA and telecommunication changes.

¹² ATCO has advised that its scope of work will consist of protection and control, SCADA and telecommunication changes at Newell 2075S substation.

Figure 2-1: Proposed Transmission Development



2.3 Proposed Transmission Development Cost Estimate

The market participant has prepared a cost estimate for the Proposed Market Participant Development, described in Section 2.2. The AESO also directed AltaLink to prepare a cost estimate for the Proposed AltaLink Development described in Section 2.2.

The market participant has requested that the AESO not include the cost for the Proposed Market Participant Development in this application as the information is considered confidential and commercially sensitive.

AltaLink has estimated the cost of the Proposed AltaLink Development to be approximately \$8 million.¹³ In addition, ATCO has estimated the cost of the Proposed ATCO Development to be approximately \$1 million.¹⁴ In accordance with the ISO tariff, the AESO has determined that all costs associated with the Proposed Transmission Development will be classified as participant-related.

2.4 Transmission Development Alternatives

In addition to the Proposed Transmission Development, the AESO, in consultation with the market participant and AltaLink, examined seven other transmission development alternatives to respond to the market participant's request for system access service:

1. **Radial 240 kV connection to Milo 356S substation** – This alternative involves connecting the Facility to the existing Milo 356S substation using a radial configuration. This alternative requires adding one 240 kV circuit, approximately 40 km in length, and modifying the Milo 356S substation, including adding one 240 kV circuit breaker.
2. **Radial 240 kV connection to Newell 2075S substation** – This alternative involves connecting the Facility to the existing Newell 2075S substation using a radial configuration. This alternative requires adding one 240 kV circuit, approximately 15 km in length, and modifying the Newell 2075S substation, including adding one 240 kV circuit breaker.
3. **Radial 240 kV connection to Cassils 324S substation** – This alternative involves connecting the Facility to the existing Cassils 324S substation using a radial configuration. This alternative requires adding one 240 kV circuit approximately 14 km in length, and modifying the Cassils 324S substation, including adding one 240 kV circuit breaker.
4. **T-tap connection to the 240 kV transmission line 923L**– This alternative involves connecting the Facility to the existing 240 kV transmission line 923L using a T-tap configuration. This alternative requires adding one 240 kV circuit, approximately 5 km in length, to connect the Facility to the existing transmission line and crossing the existing 240 kV transmission line 935L.
5. **T-tap connection to the 240 kV transmission line 935L** – This alternative involves connecting the Facility to the existing 240 kV transmission line 935L using a T-tap configuration. This alternative requires adding one 240 kV circuit, approximately 5 km in length, to connect the Facility to the existing transmission line.
6. **In-and-Out connection to the 240 kV transmission line 923L** – This alternative involves connecting the Facility to the 240 kV transmission line 923L using an in-and-out configuration. This alternative requires adding a substation, including three 240 kV circuit breakers connected to the existing 240 kV transmission line 923L. This alternative requires adding one 240 kV circuit, approximately 5 km in length, to connect the Facility to the proposed substation and crossing the existing 240 kV transmission line 935L.
7. **In-and-Out connection to the 240 kV transmission line 935L** – This alternative involves connecting the Facility to the 240 kV transmission line 935L using an in-and-out configuration. This alternative requires adding a substation, including three 240 kV circuit breakers connected to the existing 240 kV transmission line 935L. This alternative requires adding one 240 kV circuit, approximately 5 km in length, to connect the Facility to the proposed substation.

Both individual T-tap connection alternatives were ruled out as these alternatives would result in more severe violations under Category A conditions and unbalanced power flows compared to the Proposed Transmission

¹³ The cost is in nominal dollars using a base year of 2024 with escalation considered. Further details of this cost estimate, which has an accuracy level of +20%/-10%, can be found in Appendix B.

¹⁴ ATCO has advised that its cost would be approximately \$800,000 but has not provided a detailed cost estimate.

Development. The remaining connection alternatives were ruled out as they involve increased transmission development, and hence overall increased cost, compared to the Proposed Transmission Development.

2.5 Connection Assessment

Power flow, voltage stability, transient stability, and short-circuit studies were conducted to assess the impact that the Proposed Transmission Development and the associated supply would have on the transmission system. Power flow and short-circuit studies were conducted prior to and following the connection of the Proposed Transmission Development and the Facility. Transient stability studies were conducted following the connection of the Proposed Transmission Development.¹⁵

Pre-Connection Assessment Results

The pre-connection assessment identified system performance issues under Category A and Category B conditions. Category A thermal criteria violations were observed on the 138 kV transmission lines 770L and 172L and the 240 kV transmission line 916L. These pre-connection Category A thermal criteria violations are expected to arise following the connection of additional generation projects in the Study Area. Thermal and voltage criteria violations were also observed under certain Category B conditions in the pre-connection assessment.

Post-Connection Assessment Results

Most of the system performance issues identified in the pre-connection assessment were also identified in the post-connection assessment, and additional system performance issues were observed. Most of the Category A thermal criteria violations observed in the pre-connection assessment were exacerbated following the connection of the Proposed Transmission Development and the Facility and new Category A thermal criteria violations were observed on the 240 kV transmission lines 924L and 927L.

Most thermal criteria violations observed in the pre-connection assessment under Category B conditions were exacerbated in the post-connection assessment, and additional Category B thermal criteria violations were observed. The voltage criteria violations observed during the pre-connection assessment under Category B conditions were also observed in the post-connection assessment.

Post-Connection Mitigation Measures

The Category A thermal criteria violations observed in post-Project scenarios can be managed by applying Section 302.1 of the ISO rules, *Real-Time Transmission Constraint Management* (TCM Rule) to curtail generation until such a time that system developments are in place to alleviate congestion. Should the AESO determine that mitigation is required to address potential thermal criteria violations under Category A conditions, the AESO may develop operational procedures or other mitigation measures.

The AESO will continue to monitor the pace of generation development and will notify market participants if it determines that it is necessary to obtain approval for an “exception” under Section 15(2) of the *Transmission Regulation*.

Real-time operational practices, existing remedial action schemes (RASs) 164, 175, 180, 219 and a new RAS for 935L/923L can be used to mitigate the post-connection system performance issues observed under certain Category B conditions.

¹⁵ The connection assessment is included as Appendix A.

2.6 Transmission Dependencies

The Proposed Transmission Development does not require the completion of any other AESO plans to expand or enhance the capability of the transmission system prior to connection.

2.7 AESO Participant Involvement Program

The AESO directed AltaLink to assist the AESO in conducting the AESO's participant involvement program (PIP). The AESO also required the market participant to assist the AESO in conducting the AESO's PIP as a condition to the AESO's approval of the Market Participant Proposal.

Between April 2023 and February 2025, AltaLink, the market participant, and the AESO used various methods to notify stakeholders about the need for development and the AESO's preferred option to respond to the system access service request. This included a notification to market participants that may be affected by the Proposed Transmission Development. The AESO has responded to questions and concerns raised by one of the notified market participants. No other questions or concerns have been raised by the other notified market participants.

Apart from the inquiries described above, there are no outstanding concerns or objections regarding the need for the Proposed Transmission Development or the AESO's preferred option to respond to the system access service request.¹⁶

2.8 Environmental and Land Use Effects

AltaLink and the market participant have advised that the Proposed Transmission Development is not expected to result in significant environmental effects.

2.9 Approval is in the Public Interest

Having regard to the following:

- the transmission planning duties of the AESO as described in Sections 29, 33 and 34 of the Act;
- the market participant request for system access service and the AESO's assessment thereof;
- the AESO's connection assessment;
- the cost estimates for the Proposed AltaLink, ATCO and Market Participant Developments;
- confirmation from AltaLink and the market participant that no significant environmental effects are expected;
- information obtained from AESO PIP activities; and
- the AESO's long-term transmission system plans;

it is the conclusion of the AESO that the Proposed Transmission Development provides a reasonable opportunity for the market participant to exchange electric energy and ancillary services. In consideration of these factors, the AESO submits that approval of this Application is in the public interest.

¹⁶ Further information regarding the AESO's PIP for this Application is included in Appendix C.

3 Request to Combine this Application with the Facility Proposal for Consideration in a Single Process

3.1 Facility Proposal

Pursuant to Subsection 35(1) of the Act, the AESO has directed AltaLink to prepare a Facility Proposal corresponding with this Application. Pursuant to Section 36 of the Act, the AESO has conditionally approved the Market Participant Proposal.

The AESO understands that the AltaLink and the market participant Facility Proposals will be filed shortly.¹⁷ The AESO requests, and expects AltaLink and the market participant will request, that this Application be combined with the Facility Proposals for consideration by the Commission in a single process. This request is consistent with Section 15.4 of the HEAA and Section 7.1 of AUC Rule 007.

3.2 Purpose

While it is believed that this Application and the Facility Proposals will be materially consistent, the AESO respectfully requests that in its consideration of each, the Commission be mindful of the fact that the documents have been prepared separately and for different purposes. The purpose of this Application is to obtain approval of the need to respond to the market participant's request for system access service and provide a preliminary description of the manner proposed to meet that need, having regard for the AESO's determination that the Proposed Transmission Development is required to provide the market participant with a reasonable opportunity to exchange electric energy and ancillary services. In contrast, the Facility Proposals will contain more detailed engineering and designs for the Proposed Transmission Development and seek approval for the construction and operation of specific facilities.

¹⁷ The AESO understands that AltaLink intends to file a Facility Proposal relating to this Application to be titled *P2447 Luna Solar Battery Phase I Connection*. The AESO understands that the market participant intends to file a Facility Proposal relating to this Application to be titled *Luna Solar+ Connection Project Facilities Application*.

4 Relief Requested

4.1 Approval is in the Public Interest

The AESO submits that its assessment of the need to meet the market participant's request for system access service is technically complete and that approval is in the public interest.

4.2 Request

For the reasons set out herein, and pursuant to Section 34 of the Act, the AESO requests that the Commission approve this Application, including issuing an approval of the need to respond to the market participant's request for system access service, and to connect the Facility to the transmission system, by means of the following transmission development:

- A. Add one 240 kV circuit to connect the Facility to the existing 240 kV transmission line 935L in a T-tap configuration;
- B. Add one 240 kV circuit to connect the Facility to the existing 240 kV transmission line 923L in a T-tap configuration; and
- C. Modify, alter, add or remove equipment, including switchgear, and any operational, protection, control and telecommunication devices required to undertake the work as planned and ensure proper integration with the transmission system.

All of which is respectfully submitted this 7th day of July, 2025.

Alberta Electric System Operator

"Electronically Submitted by"

Pravin Koshti, P.Eng., PMP
Director, Customer Access and Project Engineering

PART B – APPLICATION APPENDICES

The following appended documents support the Application (Part A).

APPENDIX A **Connection Assessment** – Appendix A contains the *AESO Engineering Connection Assessment – P2447 Luna Solar+ Project Phase 1 Connection* that assesses the transmission system performance prior to and following the connection of the Proposed Transmission Development. As part of the AESO Connection Process, the AESO defined the study scope, and provided the system models and study assumptions to the market participant who engaged a consultant to conduct the connection assessment studies. The AESO reviewed the results of the connection assessment studies prepared by the consultant, and found the results acceptable for the purposes of assessing the impacts of the Proposed Transmission Development on the transmission system.

APPENDIX B **Capital Cost Estimate** – Appendix B contains a detailed cost estimate corresponding to the Proposed Transmission Development. This estimate has been prepared by AltaLink, to an accuracy level of +20%/-10% which exceeds the accuracy required by AUC Rule 007, Section 7.1.2, NID 11. The market participant has requested that the AESO not include the cost for the Proposed Market Participant Development in this application as the information is considered confidential and commercially sensitive. ATCO has not provided a detailed cost estimate.

APPENDIX C **AESO PIP** – Appendix C contains a summary of the PIP activities conducted, in accordance with requirements of NID12 and Appendix A2 of AUC Rule 007, regarding the need to respond to the market participant's request for system access service. Copies of the relevant materials distributed during the PIP are attached for reference.

PART C – REFERENCES

- i. **AESO Planning Duties and Responsibilities** – Certain aspects of the AESO's duties and responsibilities with respect to planning the transmission system are described in the Act. For example, Section 17, Subsections (g), (h), (i), and (j), describe the general planning duties of the AESO.¹⁸ Section 33 of the Act states that the AESO "must forecast the needs of Alberta and develop plans for the transmission system to provide efficient, reliable, and non-discriminatory system access service and the timely implementation of required transmission system expansions and enhancements." Where, as in this case, the market participant (refer to note ii below) is requesting system access service, and the AESO has determined that the request requires or may require the expansion or enhancement of the capability of the transmission system, the AESO must prepare and submit for Commission approval, as per Section 34(1)(c), a needs identification document that describes the need to respond to requests for system access service, including the assessments undertaken by the AESO regarding the manner proposed to address that need. Other aspects of the AESO's transmission planning duties and responsibilities are set out in Sections 8, 10, 11, and 15 of the *Transmission Regulation*.
- ii. **Duty to Provide Transmission System Access** – Section 29 of the Act states that the AESO "must provide system access service on the transmission system in a manner that gives all market participants [Northland Power Luna I GP Inc.] wishing to exchange electric energy and ancillary services a reasonable opportunity to do so."
- iii. **AESO Transmission Planning Criteria** – In accordance with the Act, the AESO is required to plan a transmission system that satisfies applicable reliability standards. Transmission Planning (TPL) standards are included in the Alberta Reliability Standards, and are generally described on the AESO website.

In addition, the AESO's *Transmission Planning Criteria – Basis and Assumptions* is included in Appendix A.

- iv. **AESO Connection Process** – For information purposes, the AESO Connection Process, which changes from time to time, is generally described on the AESO website.
- v. **Application for Approval of the Need to Respond to a Request for System Access Service** – This Application is directed solely to the question of the need to respond to a request for system access service, as more fully described in the Act and the *Transmission Regulation* and the AESO's determination of the manner in which to respond to the request. This Application does not seek approval of those aspects of transmission development that are managed and executed separately from the needs identification document approval process. Other aspects of the AESO's responsibilities regarding transmission development are managed under the appropriate processes, including the ISO rules, Alberta reliability standards and the ISO tariff, which are also subject to specific regulatory approvals. While the Application or its supporting appendices may refer to other processes or information from time to time, the inclusion of this information is for context and reference only.

Any reference within the Application to market participants or other parties and/or the facilities they may own and operate or may wish to own and operate, does not constitute an application for approval of such facilities. The responsibility for seeking such regulatory or other approval remains the responsibility of the market participants or other parties.

¹⁸ The legislation and regulations refer to the Independent System Operator or ISO. "AESO" and "Alberta Electric System Operator" are the registered trade names of the Independent System Operator.

- vi. **Directions to the TFO** – Pursuant to Subsection 35(1) of the Act, the AESO has directed AltaLink, in its capacity as a legal owner of transmission facilities, in whose service territories the need is located, to prepare a Facility Proposal to meet the need identified. The Facility Proposal is also submitted to the Commission for approval. The AESO has also directed AltaLink, pursuant to Section 39 of the Act and Section 14 of the *Transmission Regulation*, to assist in the preparation of the AESO's Application. AltaLink has also been directed by the AESO under Section 39 of the Act to prepare a service proposal to address the need for the Proposed Transmission Development.
- vii. **Capital Cost Estimates** – The provision of capital costs estimates in the Application is for the purposes of relative comparison and context only. The requirements applicable to cost estimates that are used for transmission system planning purposes are set out in Section 25 of the *Transmission Regulation*, AUC Rule 007, and Section 504.5 of the ISO rules, *Service Proposals and Cost Estimating*.