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Aug 20, 2019

Ping-Kwan Keung

Manager for Standards, Modelling & Engineering Standards, Transmission
Alberta Electric System Operator

Dear Ping,

Re: AESO Revenue Metering Technical Requirements—Rodan Comments

Rodan is encouraged by the AESO's initiative in developing the proposed new Section 502.10 of the ISO Rules, Revenue Metering Technical Requirements ("New Section 502.10"), which is intended to replace the expired, yet currently referenced, AESO Measurement System Standard.

<https://www.aeso.ca/rules-standards-and-tariff/consultation/new-section-502-10-of-the-iso-rules-revenue-metering-technical-requirements/>

As discussed, we have concerns that the draft changes contained in Section 502.10, if enacted, may have a profound negative effect on the integrity of metering, measurement and settlement in the province. Our concerns are largely centered around the lack of clarity regarding the Meter Service Provider role and responsibilities, the metering system technical requirements and the measurement error threshold for some of the province's largest loads and generating facilities.

We are not seeking to add standards and requirements that are contrary to what is now in place. Nor do we wish to make the process and administration more onerous. In fact, we want to work closely with AESO to enhance and strengthen the existing standards and requirements, yet keeping within the intent and spirit of the recently passed Red Tape Reduction Act with the objective of reducing regulatory burden.

We would like the following to be clarified and where necessary expanded upon within the AUC Rule structure or within one or more binding authoritative documents:

- Owner free to contract with AESO approved Meter Data Manager (MDM) and Meter Service Provider (MSP) entities
- MSP and Meter System Services (MSS) roles, responsibilities and procedures clarified. (For example, there are mandatory obligations and requirements contained in the AUC Settlement Code Rule 021 for the MDM Role, but nothing similar contemplated In Section 502.10 for the MSP role and MSS.)
- Metering System Design, Engineering, Installation Requirements: Meter Requirements; Backup Metering; Sealing and Security; Communication; CT Totalization; Loss Compensation; Generally accepted utility metering practices
- Meter Accuracy; Metering System Accuracy

- Instrument Transformer Commissioning, Testing and Maintenance
- Metering System Testing Frequency/Intervals; MW Range/Class Calculation Methodology; In-Situ Testing Procedures; Reporting Procedures; Compliance and Enforcement; Record Management Requirements
- End to End, On-Site Commissioning Procedures
- MPDR Requirements
- Treatment of Meters and Instrument Transformers not approved or dispensed by Measurement Canada
- Acronyms

Detailed descriptions of these concerns are contained in the attached Appendix.

We thank you for the opportunity to present our concerns and to offer our suggestions and recommendations. We are available to discuss the contents of this document in further detail at your earliest convenience.

Yours truly,



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Encl: Appendix

cc: AESO: Dan Shield-Director, Reliability and Technical Standards.
Rodan: Mike Ramsay; Jason Zimmerman