Stakeholder Comment Matrix
Additional Feedback for New Section 502.10, *Revenue Metering Technical Requirements*

Period of Comment:	May 21, 2020	through	June 26, 2020	**Contact:**	Jenette Yearsley
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The AESO is seeking additional comments from Stakeholders on the following topics for the proposed New Section 502.10 of the ISO rules, *Revenue Metering Technical Requirements* ("Section 502.10"):

	Question	Stakeholder Comments and/or Alternate Proposal
1. "revenue meter" Definition	Further to the comments raised during the December 11, 2019 stakeholder session, as detailed in the meeting minutes posted on the AESO website, please indicate any additional concerns regarding the proposed defined term and definition "revenue meter" and provide suggested wording revisions including any physical components that should be included in the definition. "**revenue meter**" means the apparatus that measures active energy or reactive energy at intervals defined by the **ISO** for the purpose of financial settlement with the **ISO**.	*AltaLink has no additional concerns regarding the proposed defined term and definition "revenue meter".*
2. "revenue metering system" Definition	Please identify the components that should be included in the definition of "revenue metering system" beyond the components identified above for "revenue meter". Additionally, for each component indicated to be part of the "revenue metering system" please note the requirement in proposed new Section 502.10 that makes the component necessary. "**revenue metering system**" means the **metering equipment**, including the **revenue meter**, for acquisition, processing, delivery and	*AltaLink agrees the definition of "revenue metering system".*

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	storage of the interval data that is used for financial settlement with the **ISO**.	
3. Rental Meters	a) Please describe the circumstances under which your business would choose to install rental meters.	*AltaLink manages an adequate inventory of meters and as such does not consider the rental of meters for any circumstances.*
	b) Additionally, would any exceptions to the minimum technical requirements need to be considered in the proposed Section 502.10? If so, please detail and explain the impacts.	*AltaLink has no additional comments.*
4. Back-up Meters	a) Please describe the circumstances under which your business would choose to install a back-up meter.	*AltaLink would install a back-up meter under critical metering points (e.g. critical tie-lines between provinces or large generation), when directed by the ISO or customer.*
	b) Does your organization support the addition of requirements pertaining to backup meter installation in the proposed draft Section 502.10? If so, detail the criteria needed.	*No, AltaLink doesn't support the addition of requirements pertaining to backup meter installation in the proposed draft Section 502.10 as all meters in service have a reliable record, low failure rate, and excellent field response. The cost to operate backup meters, required capital investment to maintain a fleet of compliant meters and the marginal advantages doesn't justify the need to implement.*
	c) Additionally, please provide the estimated installation and operating costs for a back-up meter as well as annual maintenance costs, if any.	*AltaLink's order of magnitude estimated costs: Installation cost of ~$20,000 – $50,000, operations and maintenance costs are ~$500 – $2000/year.*
5. Shared Current Transformers	a) Please indicate whether your organization has installed meters that share CTs. If so, how many and under what conditions?	*AltaLink's practice is to have dedicated CT circuits for each metering point. Some apparatus may share the same CT circuit occasionally.*
	b) Have you experienced any issues with the meters that share CTs, such as increased meter measurement error?	*No. When multiple equipment share a common CT circuit, AltaLink's engineering practices ensure burden calculation complies with both vendor and Measurement Canada specifications, maintaining measurement accuracy.*

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	c) Does your organization think the proposed Section 502.10 should incorporate requirements regarding the sharing of CTs?	*No. Metering Service Providers (MSP) should establish independent practices to ensure metering accuracies adhering to the requirements set out by the Measurement Canada pursuant to the Electricity and Gas Inspection Measurement Act.*
6. MW Class Determination	a) How is MW class currently being calculated for in-situ testing.	*MW class currently is being calculated by average load consumption for a defined 12 month period that aligns with the business cycle.*
	b) Please provide your organizations view on the following: i. Should Section 502.10 set out a standard timeframe to be used for the data set used in the calculation of MW class. For instance, should the AESO adopt a November to November timeframe. Or does the month to month period selected not impact the data set; ii. If a standard timeframe is included in proposed Section 502.10 that does not align with your organizations current practices and systems please provide an estimate of the cost implications; iii. Should 0 MW intervals be factored into the methodology when determining MW class; iv. Should there be notification requirements for when a measurement point for a unit crosses the MW class threshold. Additionally, when should the first in-situ test be performed once the MW class changes; v. Does your organization support the 2 and 4 year testing frequency requirements based on MW class; and	*See below AltaLink's view:* *i. Month to month period selected does not impact the data set;* *ii. In the event there is an interruption to the business cycle, as the business is staffed based on this cycle there could be a requirement for additional staff to support this activity out of cycle;* *iii. Yes, 0 MW intervals should be factored into the methodology when determining MW class;* *iv. As qualified contractors to manage revenue metering equipment, as defined by regulatory governing bodies, the annual reporting should be adequate. The first in-situ test in the new class should be determined based on whether it falls into a lower class or higher class and a reasonable timeline should be included.* *v. Yes, AltaLink supports the 2 and 4 year testing frequency* requirements based on MW class; *vi. Average throughout the year should define the testing frequency. Unless there is supporting evidence to dispute this reason as not to increase operational costs with possibly marginal benefits.*

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	vi. Should a metering point with a higher impact on the grid when it is operational be tested more frequently or should it be based on the average throughout the year?	
7. In-situ Testing	In performing in-situ testing at the commissioning stage, what should the "reasonable methods" be? Should the AESO be more prescriptive?	*The current requirement for in-situ testing, as defined by AESO, is adequate. However, revenue meters often could be energized but without load during commissioning stage or for a long period of time. In such cases, AltaLink recommends the AESO to consider an alternative time line or method to be in place of in-situ test until load comes on.*
8. Measurement data errors	In subsection 9 of proposed new Section 502.10, should the AESO set a threshold for the measurement data error?	*In the event a threshold is not already specified by other regulatory bodies (i.e. Measurement Canada and/or Alberta Utilities Commission), AESO should define.*
9. Do you have any other comments regarding the proposed new Section 502.10?		*No.*