The AESO is seeking comments from Stakeholders regarding the applicability for the requirements contained in proposed New Section 502.10 of the ISO rules, *Revenue Metering Technical Requirements* (“Section 502.10”).

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<td>Please indicate, from the perspective of your business:</td>
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<td>(i) the party responsible for performing the work detailed in each</td>
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<td>requirement below; and</td>
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<td>(ii) the party that should be ultimately responsible for meeting the</td>
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<td>requirements below.</td>
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<td>Further, in subsection 4(3) below, please note the AESO’s additional</td>
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<td>request to provide information regarding the party to which the AESO</td>
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<td>should issue the measurement point definition record.</td>
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### Measurement Point Definition Record

**4(1)** The **legal owner** of a **revenue meter** must, where such **legal owner** requires a new **measurement point definition record** or an amendment to an existing **measurement point definition record**, apply to the **ISO** no later than 30 **days** prior to the first **day** of the month in which the **legal owner** of the **revenue meter** proposes to energize the new or altered **revenue metering system** for the first time.

Altalink believes there are two different situations that result in different answers to (i) and (ii).

In the situation where a party is the legal owner of the revenue meter (legal owner) and the Metering Data Provider (MDP), Altalink agrees that the legal owner would be the party responsible for performing the work detailed in 4(1) and the party ultimately responsible for meeting the requirement of 4(1).

In the situation where a party is the legal owner but IS NOT the MDP, then Altalink submits that the legal owner would be the party responsible for performing the work detailed in 4(1) but the party ultimately responsible for meeting the requirement of 4(1) would be the MDP.

Altalink wishes to clarify that the MDP is issued the MPDR by the Alberta Electric System Operator (AESO) and as a result of the legal owner may not have a copy of
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| (2) The **legal owner** of a **revenue meter** must submit to the **ISO** the information prescribed by the **ISO** when applying for a new or amended **measurement point definition record** in accordance within subsection 4(1). | AltaLink believes there are two different situations that result in different answers to (i) and (ii).  
In the situation where a party is the legal owner and the Metering Data Provided (MDP), AltaLink agrees that the legal owner would be the party responsible for performing the work detailed in 4(2) and the party ultimately responsible for meeting the requirement of 4(2).  
In the situation where a party is the legal owner but IS NOT the MDP, then AltaLink submits that the legal owner would be the party responsible for performing the work detailed in 4(2) but the party ultimately responsible for meeting the requirement of 4(2) would be the MDP.  
AltaLink wishes to clarify that the MDP is issued the MPDR by the Alberta Electric System Operator (AESO) and as a result of the legal owner may not have a copy of the MPDR. |
| Please provide information regarding the party to which the AESO should issue the measurement point definition record. | AltaLink submits that the AESO should issue the MPDR to the MDP. As a result, in certain situations the legal owner may not be the party to which the AESO issues the MPDR.                                                                                                                                                                                                                                                                                                                                                     |
| (3) The **ISO** must issue a **measurement point definition record** for a **measurement point** to the **legal owner** of the **revenue meter**, or to a **person** designated by the **legal owner** of the **revenue meter**, if the information submitted in accordance with subsection 4(2): ...                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| (4) The **legal owner** of a **revenue meter** must install and operate a **revenue meter** in accordance with **measurement point definition record** issued by the **ISO** in accordance with subsection 4(3)                                                                                                   | AltaLink submits that the legal owner is responsible for performing the work and meeting the requirement described in 4(4). The legal owner will received the MPDR and/or direction from the MDP in order to meet this requirement.                                                                                                                                                                                                                                                                                              |

**Revenue Meter**
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<td>5(1) The <strong>legal owner</strong> of a <strong>revenue meter</strong> must ensure that the <strong>revenue meter</strong> is approved, verified, sealed, re-verified and sealed, as applicable, in accordance with the <em>Electricity and Gas Inspections Act</em>, RSC 1985 c E-4, as amended.</td>
<td>AltaLink submits that the legal owner is responsible for performing the work and meeting the requirement described in 5(1)</td>
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| (2) The **legal owner** of a **revenue meter** must ensure that the **revenue meter** has an accuracy class rating that is less than or equal to 0.2% for Watthour measurement if:  
  (a) the capacity of the **metering point** of the **revenue meter** is greater than or equal to 1.0 MVA; and  
  (b) the **revenue meter** is not the subject of a dispensation under the *Electricity and Gas Inspection Act*, RSC 1985 c E-4, as amended. | AltaLink submits that the legal owner of the revenue meter is responsible for performing the work and meeting the requirement described in 5(2) |
| (3) The **legal owner** of a **revenue meter** must ensure that the **revenue meter** has an accuracy class rating that is less than or equal to 0.5% for Varhour measurement if:  
  (a) the capacity of the **metering point** of the **revenue meter** is greater than or equal to 1.0 MVA; and  
  (b) the **revenue meter** is not the subject of a dispensation under the *Electricity and Gas Inspection Act*, RSC 1985 c E-4, as amended. | AltaLink submits that the legal owner of the revenue meter is responsible for performing the work and meeting the requirement described in 5(3). |

**Measurement Transformer**

6(1) The **legal owner** of a **revenue meter** must ensure that the **measurement transformer** has an accuracy class rating less than or equal to 0.3% if:  
  (a) the **capacity** of the **metering point** of the **revenue meter** is greater than or equal to 1.0 MVA; and  
  (b) the **revenue meter** is not the subject of a dispensation under the *Electricity and Gas Inspection Act*, RSC 1985 c E-4, as amended. | AltaLink submits that the legal owner of the revenue meter is responsible for performing the work and meeting the requirement described in 6(1). |
### Stakeholder Comments

Altalink submits that the legal owner of the revenue meter is responsible for performing the work and meeting the requirement described in 6(2).

Altalink submits that the party responsible for the work and meeting the requirement in 7(1) is the MDP. The legal owner may not be in possession of the metering data as they are not responsible for it and thus cannot be responsible for the work nor meeting the requirement.

Altalink submits that the party responsible for the work and meeting the requirement in 7(2) is the MDP. The legal owner may not be in possession of the metering data as they are not responsible for it and thus cannot be responsible for the work nor meeting the requirement.

Altalink submits that the party responsible for validating the metering equipment in 7(3) is the legal owner and the party responsible for validating the metering data in 7(3) is the MDP. The legal owner may not be in possession of the metering data as they are not responsible for it and thus cannot be responsible for the work associated with metering data.

Altalink submits that the legal owner is responsible for performing the work and meeting the requirement described in 8(2).
### Question

(3) The **legal owner** of a **revenue meter** must, at the request of the ISO:

- undertake and complete in-situ tests for the **metering equipment** within a mutually agreed time frame; and
- report the results to the **ISO** within **30 days** of receiving the ISO’s request.

### Stakeholder Comments

-AltaLink submits that the legal owner of the revenue meter is responsible for performing the work and meeting the requirement described in 8(3).

### Measurement Data Corrections

9(1) The **legal owner** of a **revenue meter** must, if the **legal owner** discovers an error in **measurement data** that has been submitted to the **ISO** for financial settlement, notify the **ISO** of the error as soon as practicable in the form the **ISO** specifies.

-AltaLink submits that the party responsible for the work and meeting the requirement in 9(1) is the MDP. The legal owner may not be in possession of the metering data as they are not responsible for it and thus cannot be responsible for the work nor meeting the requirement.

(2) The **legal owner** of a **revenue meter** must include the following information in the notice referred to in subsection 9(1):

- the reason for the error; and
- the correct measurement data.

-AltaLink submits that the party responsible for the work and meeting the requirement in 9(2) is the MDP. The legal owner may not be in possession of the metering data as they are not responsible for it and thus cannot be responsible for the work nor meeting the requirement.

(4) The **legal owner** of a **revenue meter** must submit the correct measurement data to the **ISO** as soon as practicable if the ISO’s review in subsection 9(3) confirms that the previously submitted measurement data was erroneous.

-AltaLink submits that the party responsible for the work and meeting the requirement in 9(4) is the MDP. The legal owner may not be in possession of the metering data as they are not responsible for it and thus cannot be responsible for the work nor meeting the requirement.

### Restoration

10(1) The **legal owner** of a **revenue meter** must, upon becoming aware of a failure of the **revenue metering system** that may result in a restatement of measurement data that has been submitted to the **ISO**, notify the **ISO** in writing of the failure.

-AltaLink submits that the party responsible for the work and meeting the requirement in 10(1) is the MDP. The legal owner may not be in possession of the metering data as they are not responsible for it and thus cannot be responsible for the work nor meeting the requirement.

(2) The **legal owner** of a **revenue meter** must, within **30 days** of providing the notification under subsection 10(1):

- **a** investgate and determine the nature and extent of the
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| failure;  
(b) provide the ISO with written notification detailing the nature and extent of the failure; and  
(c) submit to the ISO a plan to restore the revenue metering system. | AltaLink submits that the party responsible for the work and meeting the requirement in 10(3) is the ISO. |

(3) The ISO must:  
(a) […] ; or  
(b) direct the legal owner of the revenue meter to amend the restoration plan in a manner that will resolve the failure within a reasonable amount of time. | AltaLink submits that the party responsible for the work and meeting the requirement in 10(4) is the legal owner. |

(4) The legal owner of a revenue meter must amend the restoration plan in accordance with the ISO’s direction provided in subsection 10(3)(b). | AltaLink submits that the party responsible for the work and meeting the requirement in 10(5) is the legal owner. |

(5) The legal owner of a revenue meter must restore the revenue metering system in accordance with:  
(a) the restoration plan approved by the ISO pursuant to subsection 10(3)(a); or  
(b) the restoration plan amended in accordance with subsection 10(4). | AltaLink submits that the party responsible for the work and meeting the requirement in 10(5) is the legal owner. |