

# Compliance Quarterly Report

## Q4 2015

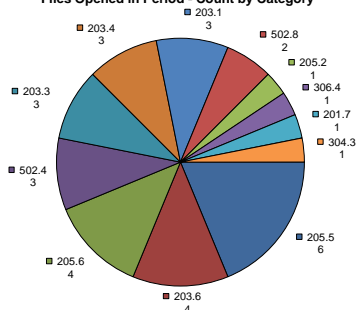
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## Compliance Quarterly Report - ISO Rules - Q4 2015

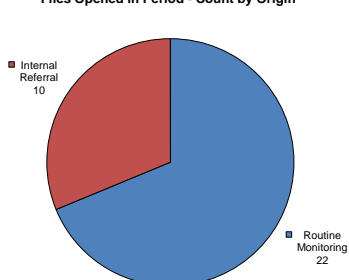
Updated: February 9, 2016

The following charts summarize the activities of the ISO Rules Compliance group in Q4 of 2015 and the distribution of events over the past 4 quarters. Please refer to the attached help documentation for details on interpreting the charts below. For any questions in regards to this report, please send an email to [marketcompliance@aeso.ca](mailto:marketcompliance@aeso.ca).

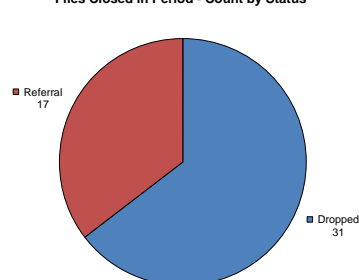
Files Opened in Period - Count by Category



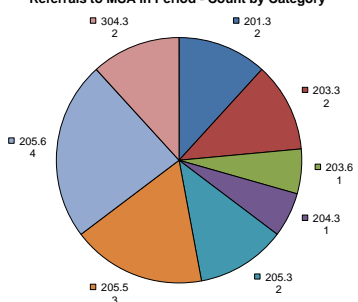
Files Opened in Period - Count by Origin



Files Closed in Period - Count by Status



Referrals to MSA in Period - Count by Category



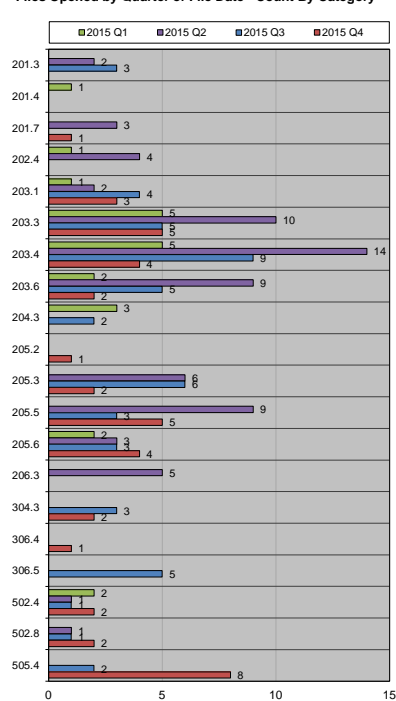
### Commentary

There were 32 files opened this quarter and 48 files closed. Of the 48 files closed in the quarter, there were 17 referrals to the MSA of suspected contraventions. These 17 referrals are distributed across 8 rules. Approximately one-half of those referrals were for Division 205 - Ancillary Services Market rules; this is in part due to increased screening of behaviour associated with those rules. There were two referrals for participants not submitting offer control information in accordance with Section 201.3 of the ISO rules, but the AESO expects this to diminish over time due to a recent enhancement to ETS that has added an improved default offer control specification for Energy and DDS offers that may be of benefit to some market participants in reducing contraventions of this rule. This enhancement is described in this recent letter posted to the AESO website - "Energy Trading System (ETS) Enhancement" dated January 19, 2016.

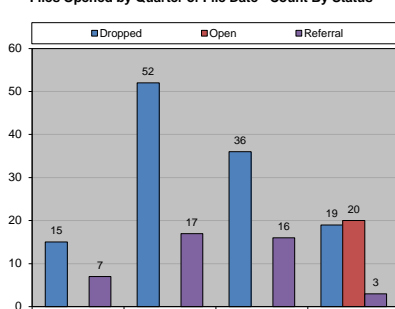
The 43 referrals to the MSA made over the past 4 quarters are distributed across 26 market participants and 12 ISO rules. Processing times vary from the last quarterly report but maintains the same median of 86 days between the occurrence of the event and closure of the handling of the event.

*Note: As the AESO may refer multiple events in a single referral to the MSA, the count of Referrals to the MSA will not necessarily line up with the count of penalties issued by the MSA in any given period.*

Files Opened by Quarter of File Date - Count By Category



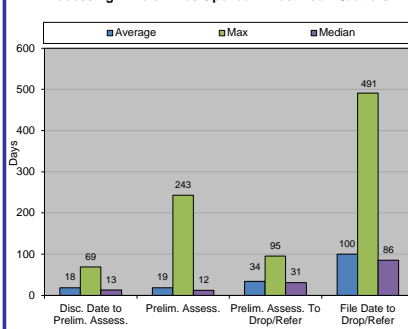
Files Opened by Quarter of File Date - Count By Status



Referrals to MSA by Quarter of File Date and Masked ID

Participant	2015 Q1	2015 Q2	2015 Q3	2015 Q4
P1		4		
P2		2		
P3		1		
P4		2		
P5	1	1	1	
P6		1		
P7			1	
P8	1	1		
P9		1		
P10		1		
P11		1		
P12	1			
P13			1	
P14			1	
P15				1
P16		1		
P17				1
P18			2	
P19	1	2	1	
P20		1		1
P21		3		
P22	1			
P23			1	
P24	1	1	1	
P25		1		
P26	1			

Processing Time of Files Opened in Last Four Quarters



Referral to MSA by Quarter of File Date and Category

Category	2015 Q1	2015 Q2	2015 Q3	2015 Q4
201.3			2	
201.4	1	3		
201.7				1
203.1			1	
203.3	4	1	2	
203.4			1	
203.6	1	4	1	1
204.3			1	
205.3			2	
205.5		6	2	
205.6	1	3	3	1
304.3			2	

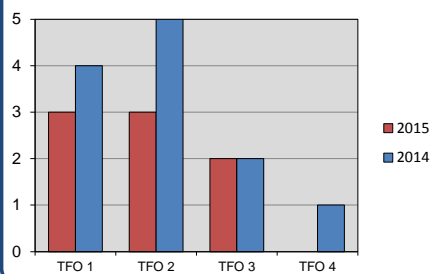
## Compliance Quarterly Report - Sections 9.1 and 501.2 of the ISO Rules - Q4 2015

**Updated: February 9, 2016**

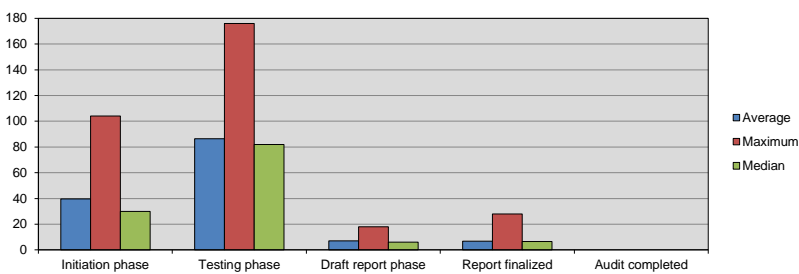
The following charts summarize the status of the 2015 and 2014 activities of ISO Rules Compliance group in relation to Sections 9.1 and 501.2 of the ISO Rules as of Q4 2015. For any questions in regards this report, please send an email to [tpcompliance@aeso.ca](mailto:tpcompliance@aeso.ca) (for Section 9.1) or [securityrulecompliance@aeso.ca](mailto:securityrulecompliance@aeso.ca) (for Section 501.2).

### Section 9.1 of the ISO Rules

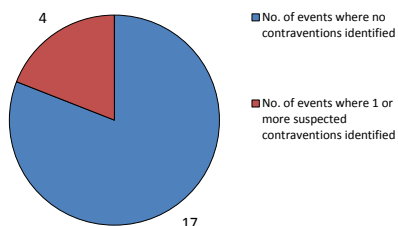
**1. Distribution of 2015/2014 Audits - Count by Masked TFO**



**3. 2015/2014 ISO Rule 9.1 Completed Compliance Audits – Duration in days of each phase**



**2. 2015/2014 ISO Rule 9.1 Event Outcomes - Count by Category**



### Commentary

This report for 2015 includes information up to the date of this report, and a summary of activities and monitoring for 2014.

In 2015, there were 7 full audits planned for the year and as of the date of this report, all have been completed. In addition, the AESO was also requested to perform 1 focused audit in relation to specific procurements of a transmission facility project. This focused audit has also been completed as of the date of this report. In 2014, 12 full audits were completed. The distribution of full and focused audits across legal owners of transmission facilities ("TFO") is presented in Graph No. 1.

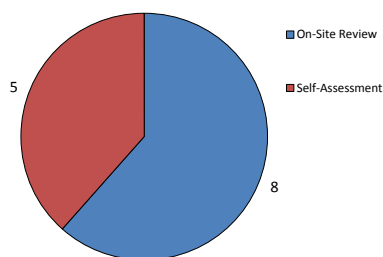
There were no other (non-audit) 9.1 events that needed investigation by the Compliance group in 2015 and 1 event related to Section 9.1.5.10 of the ISO Rules was investigated in 2014.

No referrals were sent to the MSA resulting from the AESO's compliance monitoring of Section 9.1 in 2015. In 2014, 4 referrals were sent to the MSA regarding suspected contraventions of Section 9.1.

Graph No. 3 serves as an indication of the time it has taken to complete the various phases of each completed audit. For the years 2015 and 2014, it took the AESO an average of 140 days to complete an audit.

### Section 501.2 of the ISO Rules

**ISO Rule 501.2 - 2015 Compliance Monitoring by Type**



### Commentary

This report for 2015 includes information up to the date of this report.

The AESO initiated On-Site Reviews for 8 selected sites designated as Critical Facilities by the Alberta Security and Strategic Intelligence Support Team ("ASSIST"). These On-Site Reviews were carried out by the Energy Security Unit ("ESU") of the Justice and Solicitor General Branch of the Alberta Government. All of the site visits were scheduled in September and October of 2015 and were completed by the end of 2015. In addition, the AESO selected 5 other Critical Facilities where the legal owners were required to complete and submit the Section 501.2 Self-Assessment Templates created by the AESO. All of the Self-Assessments were submitted by the end of September 2015. No referrals were sent to the MSA resulting from the AESO's compliance monitoring of Section 501.2 in 2015.

The AESO is currently formalizing a schedule of On-Site Reviews and Self-Assessments of Critical Facilities to be carried out in 2016. Once completed, this will be communicated to each legal owner.

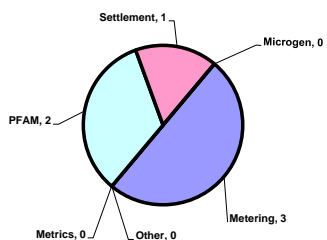
In Q2 2015, a new section was added to the Compliance section of the AESO website titled "ISO Rule 501.2 Compliance Monitoring". This is intended to provide greater clarity and transparency regarding the AESO's monitoring of legal owner compliance with Section 501.2 of the ISO Rules. Among the documents is a Compliance Monitoring Program Guide, as well as related templates. These documents provide market participants with a comprehensive description of how compliance monitoring is conducted. These documents will be updated and enhanced as the processes are refined and market participants are encouraged to review them at regular intervals. During 2015, the AESO also conducted several stakeholder information sessions to present its plans to monitor Section 501.2 of the ISO Rules and provide training on completion of the Self-Assessments. Copies of the presentation slides are available in the AESO website.

## Compliance Quarterly Report - Load Settlement - Q4 2015

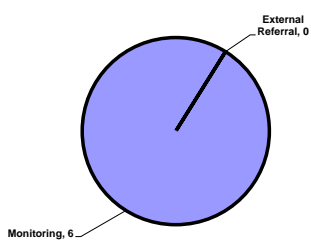
Update February 11, 2016

The following charts summarize the activities of the Load Settlement Compliance group over the four quarters ending December 2015. Please refer to the attached chart explanation and help documentation for details on interpreting the charts below. For any questions in regards this report, please send an email to [compliance@aeso.ca](mailto:compliance@aeso.ca).

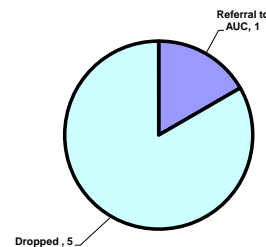
Files Opened in Period - Count by Category



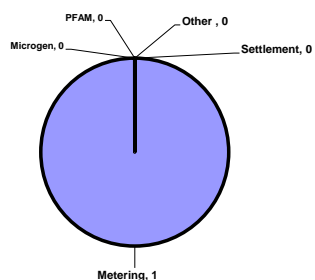
Files Opened in Period - Count by Origin



Files Closed in Period - Count by Status



Referrals to AUC in Period - Count by Category



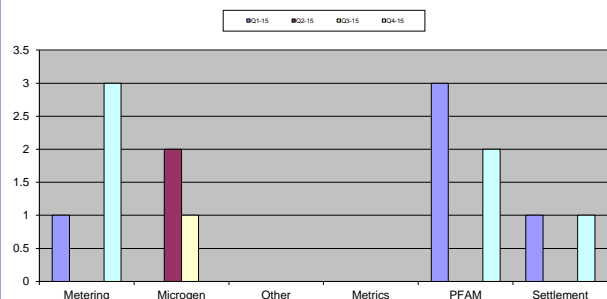
### Commentary

For the fourth quarter of 2015 we continue to see very low errors from market participants in all areas. Including settlement, microgen, metering and post final adjustment data. This steady improvement with market participants compliance to Rule 21 shows that the Rule is stabilizing and market participants systems are working. In Q4 there were 3 files opened for metering discrepancies and 2 for PFAM discrepancies. The files were only minimally financially impacting.

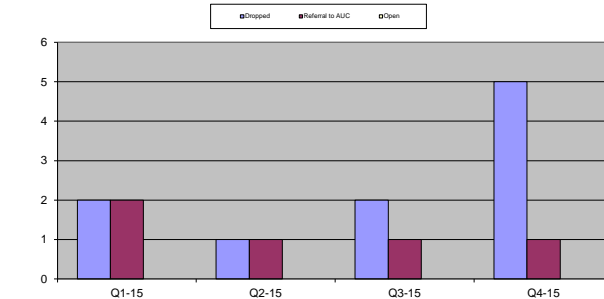
We will continue to work with industry and the AUC to simplify and streamline Rule 021 to make it more effective for all involved.

The five of six issues opened in Q4 were minor enough to be dealt with directly with the participants involved. The AUC is notified in those cases but a formal investigation is not undertaken.

Files Opened by Quarter - Count By Category



Files Opened by Quarter - Count by Status



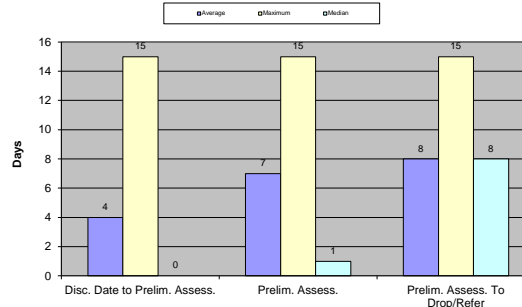
Referrals to AUC by Quarter of Referral Date and Masked Participant ID

Participant	Q1-15	Q2-15	Q3-15	Q4-15
LS1				
LS2				
LS3	1	1		
LS4	2		1	
LS5				
LS6	1			
LS7	1			1
LS8				
LS9				
LS10				
LS11	1			
LS12				
LS13				

Referrals to AUC by Quarter of Referral Date and Category

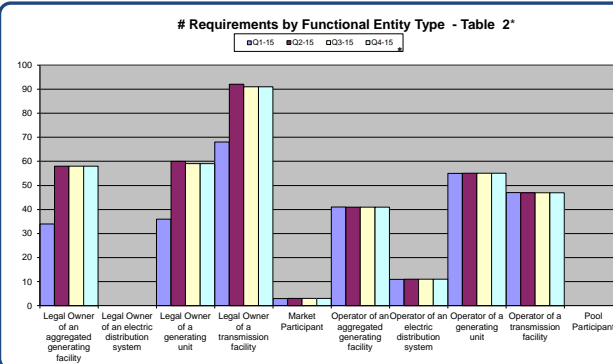
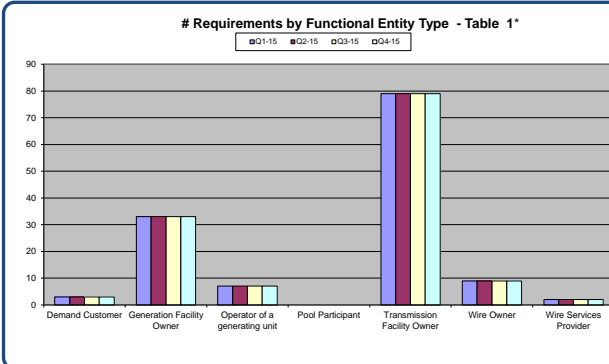
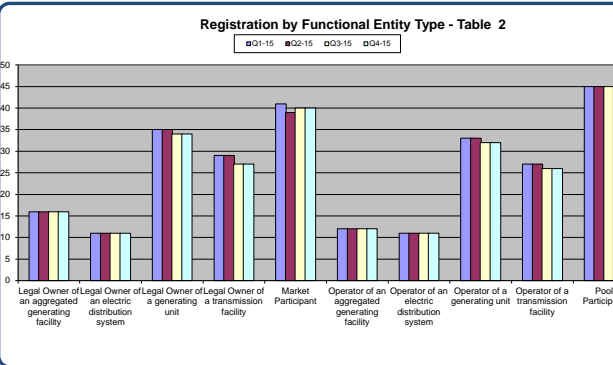
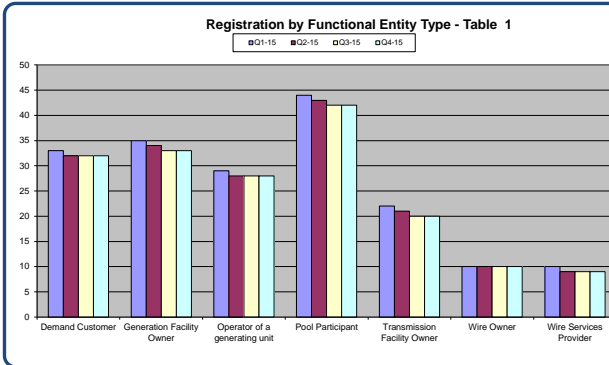
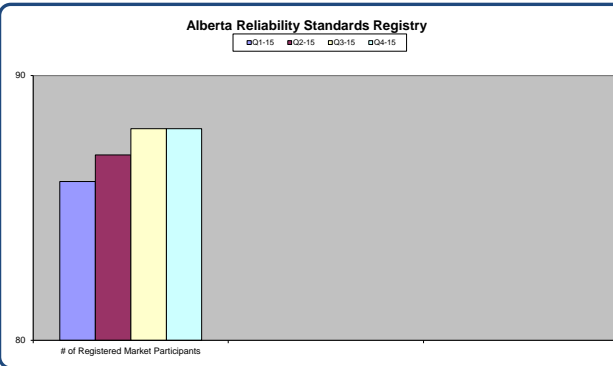
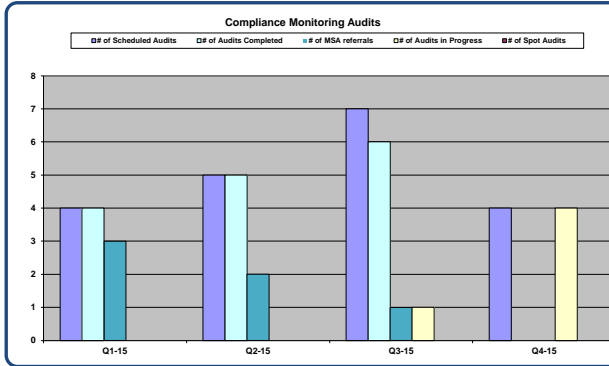
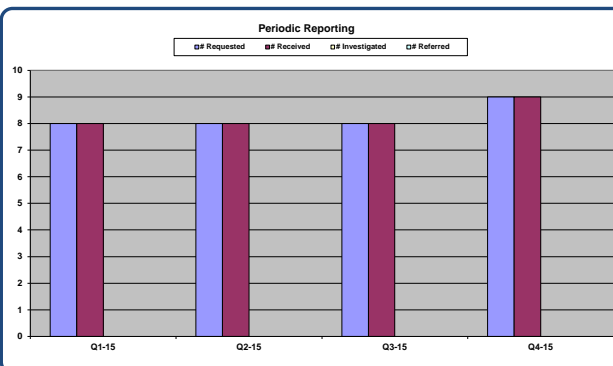
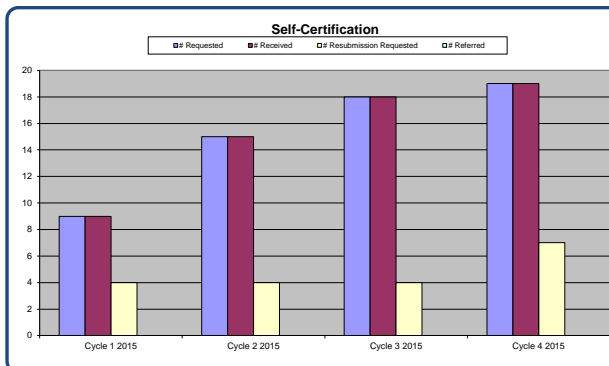
Category	Q1-15	Q2-15	Q3-15	Q4-15
Metering	1			1
Microgen		1	1	
Other				
Metrics				
PFAM				
Settlement	1			

Processing Time of Files Opened in Last Four Quarters



## Compliance Quarterly Report - Alberta Reliability Standards Monitoring - Q4 2015

The following charts summarize the activities of the Alberta Reliability Standards Compliance Monitoring group for Q4/2015 and the distribution of events over the past four quarters. Please refer to the attached help documentation for details on interpreting the charts below. For any questions in regards this report, please send an email to [rscompliance@aeso.ca](mailto:rscompliance@aeso.ca).



\*Note: As the AESO may refer multiple items within a single referral to the MSA, the count of Referrals to MSA will not necessarily line up with the count of penalties issued by the MSA in any given period.

Common Terminology	
<b>Category</b>	Each <b>Compliance File</b> has an associated Category which refers to the ISO rule, AUC Rule 021 topic or Reliability Standard which may have been contravened. In the case of multiple categories, a principle category is assigned to the File.
<b>Clarification Request</b>	An email request sent in the ISO Rules Compliance process seeking additional detail on the information submitted with an offer restatement. This is part of the ISO Rules <b>Monitoring</b> process.
<b>Compliance File</b>	A compliance file refers to one or more Flagged Events that have been logged for Preliminary Assessment, or where a suspected contravention has been identified through a Compliance Monitoring Audit in accordance with ISO Rule 103.12. Every Compliance File has a status of Open, Dropped or Referred. Each Compliance File is applicable to a single market participant and has an associated File Date and Category.
<b>Compliance Monitoring Audit</b>	As described in ISO Rule 103.12. The process of monitoring or review of a TFO's compliance with ISO Rule 9.1.5.
<b>Compliance Monitoring Audit Report</b>	A report described in ISO Rule 103.12.9 (4) which communicates the results of the Compliance Monitoring Audit to the TFO and provides support for any referral to the MSA.
<b>Date of Discovery</b>	For an <b>internal</b> or <b>external referral</b> , the date that the referral was received. For an event identified by <b>Monitoring</b> , the date on which the AESO discovers the event and logs it for <b>Preliminary Assessment</b> .
<b>Date of Notification</b>	The date that a TFO is notified of a Compliance Monitoring Audit of its transmission facility project and a request for information that facilitate commencement of the Compliance Monitoring Audit.
<b>File</b>	Synonym for <b>Compliance File</b> .
<b>File Date</b>	A unique date associated with a <b>Compliance File</b> . In the case of ISO rules compliance, this is the date of the <b>event</b> itself. In the case of AUC 021 monitoring, this is the <b>Date of Discovery</b> .
<b>Files Closed in Period</b>	Compliance Files whose <b>status</b> changed to either <b>Dropped File</b> or <b>Referred File</b> within the reporting period. Note that these may have file dates from earlier quarters.
<b>Files Opened in Period</b>	Compliance Files with a <b>Date of Discovery</b> falling within the reporting period.
<b>Flagged Event</b>	A collection of one or more submissions or actions carried out by a market participant that may form the basis of a compliance file. Flagged events can come from <b>Monitoring</b> , an <b>Internal Referral</b> or an <b>External Referral</b> or from <b>Clarification Requests</b> .
<b>Information Request</b>	As described in ISO Rule 103.12, an Information Request is a letter submitted to a market participant describing the particulars of a potential ISO rule, AUC 021 topic or Reliability Standard contravention and seeking the market participant's input on the event.
<b>Masked Participant ID</b>	A unique identifier associated with each market participant for tracking <b>Referred Files</b> for that participant but without revealing the particular participant. The Masked Participant ID will NOT be consistent from report to report.
<b>Masked Transmission Facility Owner (TFO)</b>	A unique identifier associated with each <b>TFO</b> for tracking Compliance Monitoring Audits for that participant but without revealing the <b>TFO</b> name. The Masked <b>TFO</b> ID will NOT be consistent from report to report.
<b>Monitoring</b>	Queries, reports and other tools run by Compliance on a regular basis to identify <b>Flagged Events</b> .
<b>Other</b>	A <b>Category</b> of Other applies to events which Compliance examined but did not prove to be associated with any potential rule contravention.
<b>Other Events</b>	Compliance monitoring activities, other than Compliance Monitoring Audit, in relation to ISO Rule 9.1.1 <i>Monthly Reporting</i> , ISO Rule 9.1.3.4 <i>Project Change Proposal</i> , and ISO Rule 9.1.3.6 <i>Final Cost Report</i> .
<b>Preliminary Assessment</b>	As described in ISO Rule 103.12. The process of carrying out a detailed examination of a potential ISO rule, AUC 021 topic or Reliability Standard contravention (which is separate from a Compliance Monitoring Audit). This starts with the opening of a Compliance File and culminates in a decision to: send an Information Request regarding the event to the relevant market participant; to conclude that the data does not support an assessment of non-compliance and to drop the event; or, potentially, to make a referral to the AUC or MSA.
<b>Referrals in Period</b>	Compliance Files which have been referred to the MSA/AUC (as appropriate) in the period. Note that these may have file dates from previous quarters.
<b>TFO Records</b>	Documents, correspondences and other records of information that support compliance with ISO Rule 9.1.5
<b>Warning Letter</b>	In certain cases where a Preliminary Assessment has not been carried out or does not support an assessment of non-compliance, a letter may be sent to one or more participants which clarifies the obligations of a particular rule.

Table Specific Terminology	
<b>Origin</b>	A <b>Compliance File</b> has an origin which is an indication of how the <b>Flagged Event</b> was identified eg. <b>Monitoring</b> , <b>SC Referral</b> , <b>OC Referral</b> , etc.
<b>CR</b>	A <b>File Origin</b> of CR indicates that the event resulted from a <b>Clarification Request</b> .
<b>External Referral</b>	A <b>File Origin</b> of External Referral is a possible ISO rule, AUC 021 topic or Reliability Standard contravention identified by individuals outside the AESO and referred to compliance for a more detailed examination.
<b>Internal Referral</b>	A <b>File Origin</b> of Internal Referral is a possible ISO rule, AUC 021 topic or Reliability Standard contravention identified by other (non-compliance) personnel in the AESO in the course of their own work and referred to compliance for a more detailed examination.
<b>Other</b>	A File Origin of type Other refers to events which Compliance examined but which were brought to our attention through untypical means such as a question from a market participant or an AESO IT problem report.
<b>Status</b>	The current state of a <b>Compliance File</b> . Either <b>Open File</b> , <b>Dropped File</b> or <b>Referred File</b> .
<b>Dropped File</b>	The status of a Compliance File which is closed but is not a Referred File. A File may be closed for a variety of different reasons including: unreliable data, AESO IT system problems, Mitigating Factors as defined in ISO Rule 103.12 or an assessment that no rule has been contravened. A dropped file may have resulted in a Warning Letter being sent.
<b>Open File</b>	The <b>status</b> of a <b>Compliance File</b> which has been opened but which has not yet been <b>Dropped</b> or <b>Referred</b> to the MSA/AUC.
<b>Referred File</b>	The status of a Compliance File for which a referral regarding the file has been made to the AUC/MSA in accordance with ISO Rule 103.12.
<b>Processing Time of Files Opened in the Last Four Quarters</b>	An indication of the number of days taken to move a <b>Compliance File</b> through the various stages of the Compliance Process.
<b>Disc. Date to Prelim. Assess</b>	The number of days between the <b>Date of Discovery</b> for a <b>Compliance File</b> and the commencement of the <b>Preliminary Assessment</b> .
<b>Prelim. Assess.</b>	The number of days between the commencement of the <b>Preliminary Assessment</b> and its completion.
<b>Prelim. Assess. To Drop/Refer</b>	The number of days between the completion of a <b>Preliminary Assessment</b> and the decision to drop or refer the file to the MSA/AUC. This is only relevant for events where an <b>Information Request</b> was sent.
<b>File Date to Drop/Refer</b>	The number of days between the <b>File Date</b> and the change in status for the <b>Compliance File</b> to either <b>Dropped File</b> or <b>Referred File</b> .
<b>Duration of ISO Rule 9.1 Compliance Audits</b>	An indication of the number of weeks taken to move a Compliance Monitoring Audit through the various stages of the audit process.
<b>Initiated</b>	The number of weeks between the <b>Date of Notification</b> and the date that the AESO received the <b>TFO Records</b> .
<b>Testing phase</b>	The number of weeks between the receipt of the <b>TFO Records</b> and the date that the AESO provided a Draft <b>Compliance Monitoring Audit Report</b> to the TFO for review and comments.
<b>Draft report phase</b>	The number of weeks between the end of the Testing Phase and the receipt of TFO comments on the draft <b>Compliance Monitoring Audit Report</b> .
<b>Report finalized</b>	The number of weeks between the receipt of the Draft <b>Compliance Monitoring Audit Report</b> with TFO comments and the <b>Compliance Monitoring Audit Report</b> is finalized.
<b>Audit completed</b>	The number of weeks between the date of finalizing the <b>Compliance Monitoring Audit Report</b> and the date of referral to the MSA or closing the audit, in case of non-referral.