

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



<p><b>Period of Comment:</b> May 21, 2020 through June 26, 2020</p> <p><b>Comments From:</b> EPCOR Distribution &amp; Transmission Inc.</p> <p><b>Date:</b> 2020/06/26</p>	<p><b>Contact:</b> Hala El Saadi</p> <p><b>Phone:</b> 780-412-3525</p> <p><b>Email:</b> halsaadi@epcor.com</p>
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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	<p>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.</p> <p>“<b>revenue meter</b>” means the apparatus that measures active energy or reactive energy at intervals defined by the <b>ISO</b> for the purpose of financial settlement with the <b>ISO</b>.</p>	<p>EPCOR would like to be consistent with the definition outlined in the Electricity &amp; Gas Inspection Act</p> <p>Electricity &amp; Gas Inspection Act:</p> <p><b>meter</b> means an electricity or gas meter and includes any apparatus used for the purpose of making measurements of, or obtaining the basis of a charge for, electricity or gas supplied to a purchaser</p>
2. “revenue metering system” Definition	<p>Please identify the components that should be included in the definition of “revenue metering system” beyond the components identified above for “revenue meter”.</p> <p>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.</p> <p>“<b>revenue metering system</b>” means the <b>metering equipment</b>, including the <b>revenue meter</b>, for acquisition, processing, delivery and</p>	<p>The components that should be included are the Meter and Measurement Transformers.</p> <p>Meter Data Management and CIS systems are including under the Metering Data Services in the old standard and EPCOR agrees with them being separated.</p>

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	storage of the interval data that is used for financial settlement with the <b>ISO</b> .	
3. Rental Meters	a) Please describe the circumstances under which your business would choose to install rental meters.	Require clarification on what AESO considers “Rental Meters”.
	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.	
4. Back-up Meters	a) Please describe the circumstances under which your business would choose to install a back-up meter.	EPCOR does not have any back up meters in their DFO zone.
	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.	
	c) Additionally, please provide the estimated installation and operating costs for a back-up meter as well as annual maintenance costs, if any.	
5. Shared Current Transformers	a) Please indicate whether your organization has installed meters that share CTs. If so, how many and under what conditions?	EPCOR requires clarification on what AESO deems as a shared CT.
	b) Have you experienced any issues with the meters that share CTs, such as increased meter measurement error?	
	c) Does your organization think the proposed Section 502.10 should incorporate	

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	requirements regarding the sharing of CTs?	
6. MW Class Determination	<p>a) How is MW class currently being calculated for in-situ testing.</p> <p>b) Please provide your organizations view on the following:</p> <ul style="list-style-type: none"> <li>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;</li> <li>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;</li> <li>iii. Should 0 MW intervals be factored into the methodology when determining MW class;</li> <li>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;</li> <li>v. Does your organization support the 2 and 4 year testing frequency requirements based on MW class; and</li> <li>vi. Should a metering point with a higher impact on the grid when it is operational</li> </ul>	<p>a) An average MW from Jan 1 – Dec 31 is determined and then the timeframe for in-situ testing is assigned based on the AESO Measurement System Standard.</p> <p>b)</p> <ul style="list-style-type: none"> <li>i. AESO should define a standard timeframe to maintain consistency and to provide clarity.</li> <li>ii. If AESO maintains a yearly timeframe or greater there is no cost impact. If testing is required more frequently than annually there will be cost implications. EPCOR requires more information to determine cost impact for increased frequency in testing.</li> <li>iii. 0 MW actual intervals should be excluded to prevent skewing data from the normal average MW for that site.</li> <li>iv. Changes in annual MW average could require a notification to re-evaluate testing time frames.</li> <li>v. EPCOR is open to further discussions to get an understanding of the change in risk level and monitoring.</li> <li>vi. EPCOR is open to further discussions to get an understanding of the impact if this is tested less frequent or at the current time frame. What risk will this impose if the frequency of testing is not increased?</li> </ul>

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	<p>be tested more frequently or should it be based on the average throughout the year?</p>	
<p>7. In-situ Testing</p>	<p>In performing in-situ testing at the commissioning stage, what should the “reasonable methods” be? Should the AESO be more prescriptive?</p>	<p>AESO should be more prescriptive, but EPCOR would like to have further stakeholder discussion on what should be included in the Metering System Report.</p>
<p>8. Measurement data errors</p>	<p>In subsection 9 of proposed new Section 502.10, should the AESO set a threshold for the measurement data error?</p>	<p>AESO should not set a threshold for the measurement data error. There is already a responsibility on the Load Settlement Agent outlined in AUC Rule 021 to ensure accurate data and to identify any updates in data.</p>
<p>9. Do you have any other comments regarding the proposed new Section 502.10?</p>		<p>Not at this point.</p>