

Stakeholder Comment Matrix

Proposed Applicability of New Section 502.10, Revenue Metering Technical Requirements



<p>Period of Comment: May 21, 2020 through June 26, 2020</p> <p>Comments From: TransCanada Energy Ltd. (TCE)</p> <p>Date: 2020/06/26</p>	<p>Contact: Mark Thompson</p> <p>Phone: 403-589-7193</p> <p>Email: markj_thompson@tcenergy.com</p>
---	---

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”).

Question	Stakeholder Comments
<p>Please indicate, from the perspective of your business:</p> <ul style="list-style-type: none"> (i) the party responsible for performing the work detailed in each requirement below; and (ii) the party that should be ultimately responsible for meeting the requirements below. <p>Further, in subsection 4(3) below, please note the AESO’s additional request to provide information regarding the party to which the AESO should issue the measurement point definition record.</p>	
<p>Measurement Point Definition Record</p> <p>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.</p>	<p><i>As a general comment that relates to each of the sections in this comment matrix, TCE recommends that the AESO implement the principal that the party responsible for performing the work be the party responsible for meeting the requirement. TCE submits that this principal will promote the efficient use of resources since it eliminates the unnecessary involvement of an additional party from the process. In many cases, the additional party will not have the necessary credentials to do the work. TCE understands that this principal is generally consistent with the current Measurement System Standard. To the extent that the AESO desires flexibility to allow the legal owner to be responsible for meeting the requirements when a third party is performing the work, TCE recommends that the AESO default to the principal described above, but permit the legal owner to elect to take responsibility for meeting the requirements if desired.</i></p>

	<p><i>From TCE's perspective, the legal owner is responsible for performing the work required in this section and thus should be responsible for meeting the requirement.</i></p>
<p>(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).</p>	<p><i>Please refer to the first paragraph in the response to section 4(1) above.</i></p> <p><i>From TCE's perspective, the legal owner is responsible for performing the work required in this section and thus should be responsible for meeting the requirement.</i></p>
<p>Please provide information regarding the party to which the AESO should issue the measurement point definition record.</p> <p>(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): ...</p>	<p><i>Please refer to the first paragraph in the response to section 4(1) above.</i></p> <p><i>From TCE's perspective, the AESO is responsible for performing the work required in this section and thus should be responsible for meeting the requirement.</i></p> <p><i>Because the legal owner should be responsible for applying for the measurement point definition record (refer to section 4(1) above), TCE submits that the AESO should issue the measurement point definition record to the legal owner. The legal owner will provide this to the Metering Service Provider (MSP, e.g., Rodan) as necessary.</i></p>
<p>(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)</p>	<p><i>Please refer to the first paragraph in the response to section 4(1) above.</i></p> <p><i>From TCE's perspective, the requirements to install <u>and</u> operate the revenue meter should be separated. The legal owner is responsible for installing the revenue meter and thus should be responsible for meeting the requirement. It is unclear what the AESO means by "operating a revenue meter". To the extent that "operating a revenue meter" means to maintain the revenue meter, TCE submits that the MSP is responsible for operating the meter and thus should be responsible for meeting the requirement.</i></p>
<p>Revenue Meter</p>	
<p>5(1) The legal owner of a revenue meter must ensure that the revenue meter is approved, verified, sealed, re-verified and sealed, as applicable, in accordance with the <i>Electricity and Gas Inspections Act</i>, RSC 1985 c E-4, as amended.</p>	<p><i>Please refer to the first paragraph in the response to section 4(1) above.</i></p> <p><i>From TCE's perspective, the MSP is responsible for performing the work required in this section (the legal owner is not certified to perform this task) and thus should be responsible for meeting the requirement.</i></p>

<p>(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:</p> <ul style="list-style-type: none"> (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 <i>Electricity and Gas Inspection Act</i>, RSC 1985 c E-4, as amended. 	<p><i>Please refer to the first paragraph in the response to section 4(1) above.</i></p> <p><i>From TCE's perspective, the legal owner is responsible for performing the work required in this section and thus should be responsible for meeting the requirement.</i></p>
<p>(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:</p> <ul style="list-style-type: none"> (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 <i>Electricity and Gas Inspection Act</i>, RSC 1985 c E-4, as amended. 	<p><i>Please refer to the first paragraph in the response to section 4(1) above.</i></p> <p><i>From TCE's perspective, the legal owner is responsible for performing the work required in this section and thus should be responsible for meeting the requirement.</i></p>
<p>Measurement Transformer</p>	
<p>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:</p> <ul style="list-style-type: none"> (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 <i>Electricity and Gas Inspection Act</i>, RSC 1985 c E-4, as amended. 	<p><i>Please refer to the first paragraph in the response to section 4(1) above.</i></p> <p><i>From TCE's perspective, the legal owner is responsible for performing the work required in this section and thus should be responsible for meeting the requirement.</i></p>
<p>(2) The legal owner of a revenue meter must, unless the ISO approves otherwise, ensure that the measurement transformer:</p> <ul style="list-style-type: none"> (a) is located and connected without compensation methods; (b) produces a real metering point; and 	<p><i>Please refer to the first paragraph in the response to section 4(1) above.</i></p> <p><i>From TCE's perspective, the legal owner is responsible for performing the work required in this section and thus should be responsible for meeting the requirement.</i></p>

<p>(c) has a dedicated current transformer core for measurement.</p>	
<p>Metering Data Services</p>	
<p>7(1) The legal owner of a revenue meter must retain metering data from the revenue metering system, including a record of final estimates and adjustments and the method used to perform the estimates or adjustments, in the electronic format specified in the Commission’s Rule 021: Settlement System Code Rules for a period of at least 8 years.</p>	<p><i>Please refer to the first paragraph in the response to section 4(1) above.</i></p> <p><i>From TCE’s perspective, the legal owner is responsible for performing the work required in this section and thus should be responsible for meeting the requirement.</i></p>
<p>(2) The legal owner of a revenue meter must process metering data for each measurement point in accordance with the algorithm in the measurement point definition record issued in accordance with subsection 4(3).</p>	<p><i>Please refer to the first paragraph in the response to section 4(1) above.</i></p> <p><i>From TCE’s perspective, the MSP is responsible for performing the work required in this section and thus should be responsible for meeting the requirement.</i></p>
<p>(3) The legal owner of a revenue meter must, within 30 days of energizing the revenue meter for the first time, validate the metering equipment and the metering data using reasonable methods and alternative data sources.</p>	<p><i>Please refer to the first paragraph in the response to section 4(1) above.</i></p> <p><i>From TCE’s perspective, the legal owner is responsible for ensuring the work is completed within the required timeframe and thus should be responsible for this requirement. However, MSP is responsible for ensuring the validation uses reasonable methods and alternative data sources and thus should be responsible for meeting this part of the requirement.</i></p>
<p>Revenue Meter Testing and Reporting</p>	
<p>8(2) The legal owner of a revenue meter must provide the results of the in-situ test performed in subsection 8(1) to ISO if the test resulted in an error measurement of +/- 3%.</p>	<p><i>Please refer to the first paragraph in the response to section 4(1) above.</i></p> <p><i>From TCE’s perspective, the MSP is responsible for performing the work required in this section and thus should be responsible for meeting the requirement.</i></p>
<p>(3) The legal owner of a revenue meter must, at the request of the ISO:</p> <ul style="list-style-type: none"> (a) undertake and complete in-situ tests for the metering equipment within a mutually agreed time frame; and (b) report the results to the ISO within 30 days of receiving the 	<p><i>Please refer to the first paragraph in the response to section 4(1) above.</i></p> <p><i>From TCE’s perspective, the legal owner is responsible for performing the work required in this section and thus should be responsible for meeting the requirement.</i></p>

<p>ISO's request.</p>	
<p>Measurement Data Corrections</p>	
<p>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.</p>	<p><i>Please refer to the first paragraph in the response to section 4(1) above.</i> <i>From TCE's perspective, the legal owner is responsible for performing the work required in this section and thus should be responsible for meeting the requirement.</i></p>
<p>(2) The legal owner of a revenue meter must include the following information in the notice referred to in subsection 9(1):</p> <ul style="list-style-type: none"> (a) the reason for the error; and (b) the correct measurement data. 	<p><i>Please refer to the first paragraph in the response to section 4(1) above.</i> <i>From TCE's perspective, the legal owner is responsible for performing the work required in this section and thus should be responsible for meeting the requirement.</i></p>
<p>(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.</p>	<p><i>Please refer to the first paragraph in the response to section 4(1) above.</i> <i>From TCE's perspective, the legal owner is responsible for performing the work required in this section and thus should be responsible for meeting the requirement.</i></p>
<p>Restoration</p>	
<p>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.</p>	<p><i>Please refer to the first paragraph in the response to section 4(1) above.</i> <i>From TCE's perspective, the legal owner is responsible for performing the work required in this section and thus should be responsible for meeting the requirement.</i></p>
<p>(2) The legal owner of a revenue meter must, within 30 days of providing the notification under subsection 10(1):</p> <ul style="list-style-type: none"> (a) investigate and determine the nature and extent of the 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 	<p><i>Please refer to the first paragraph in the response to section 4(1) above.</i> <i>From TCE's perspective, the legal owner is responsible for performing the work required in this section and thus should be responsible for meeting the requirement.</i></p>

<p>system.</p>	
<p>(3) The ISO must:</p> <p>(a) [...] ; or</p> <p>(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.</p>	<p><i>Please refer to the first paragraph in the response to section 4(1) above.</i></p> <p><i>From TCE's perspective, the AESO is responsible for performing the work required in this section and thus should be responsible for meeting the requirement.</i></p>
<p>(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).</p>	<p><i>Please refer to the first paragraph in the response to section 4(1) above.</i></p> <p><i>From TCE's perspective, the legal owner is responsible for performing the work required in this section and thus should be responsible for meeting the requirement.</i></p>
<p>(5) The legal owner of a revenue meter must restore the revenue metering system in accordance with:</p> <p>(a) the restoration plan approved by the ISO pursuant to subsection 10(3)(a); or</p> <p>(b) the restoration plan amended in accordance with subsection 10(4).</p>	<p><i>Please refer to the first paragraph in the response to section 4(1) above.</i></p> <p><i>From TCE's perspective, the MSP is responsible for performing the work required in this section and thus should be responsible for meeting the requirement.</i></p>