

# Project Change Proposal Guidelines

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Table of Contents

Overview ..... 1

    The Importance of Project Change Management ..... 1

    Applicability to ISO Rules..... 1

When to Use the AESO Project Change Proposal Form..... 1

When Not to Use the AESO Project Change Proposal Form..... 1

How to Use the Project Change Proposal Form ..... 2

    TFO Instructions ..... 2

    Market Participant Instructions (not applicable to System Projects)..... 2

Project Change Proposals in the Cluster Assessment Process ..... 3

    Project Change Proposals in Stage 1 ..... 3

    Project Change Proposals in Stage 2 and beyond..... 4

## Overview

This document is provided as a guideline for users of the Project Change Proposal Form (the “PCP Form”). This guideline provides instruction to transmission facility owners (TFOs) and market participants on how and when to use a PCP Form.

### The Importance of Project Change Management

More formalized project change management procedures improve communications and visibility on project changes and provide consistency in approach. The PCP Form is a tool to document and report on project changes. It also assists to log and track information that can then be referenced in project cost discussions and used to support project final cost data.

The AESO has implemented project change management procedures to ensure the impact of any proposed change to the project is thoroughly understood, carefully considered and discussed, and formally reviewed. Once the TFO or market participant submits to the AESO a completed PCP Form, the AESO will either approve or reject the Project Change Proposal; or mark it as deficient and request more information from the TFO or market participant.

### Applicability to ISO Rules

Project change variance reports are applicable to subsections 9.1.3.2, 9.1.3.3, 9.1.3.4, and 9.1.3.5 of Section 9 of the ISO rules, *Transmission*.

## When to Use the AESO Project Change Proposal Form

The PCP Form can be used throughout the project lifecycle to:

- capture project changes per subsections 9.1.3.2, 9.1.3.3, 9.1.3.4, and 9.1.3.5 of Section 9 of the ISO rules, *Transmission*; and
- where applicable, change information in the system access service request (SASR).

## When Not to Use the AESO Project Change Proposal Form

The PCP Form should be used throughout the project life cycle for required project variance reporting with the following exceptions:

- When funds related to the Project Change Proposal have been spent in advance of AESO approval;
- For Connection, BTF, and Contract Projects: In Stage 0, where changes are addressed as updates to the SASR; and
- For Connection, BTF, and Contract Projects that are not following the Cluster Assessment Process: Changes to the applicant information on a SASR or changes in project ownership. For information on these changes, please contact the AESO Project Manager. A SASR Amending Letter may be required.

## How to Use the Project Change Proposal Form

### TFO Instructions

1. Each PCP Form should only document one project change. When there is more than one driver for change, each should be submitted as a separate PCP Form.
2. Once a project change has been determined and communicated to the AESO pursuant to subsection 9.1.3.2 of Section 9 of the ISO rules, *Transmission*, the TFO has 15 days to submit a PCP Form to the AESO. Following the initial notification, any agreement to extend beyond the required 15 days is to be documented (the request, reasons and proposed submission date of the project change proposal) by the TFO and submitted to the AESO. The AESO will provide a formal written response to the request.
3. All required sections of the PCP Form should be completed and any supporting documentation necessary to support the change should be attached.
4. For Connection Projects: It is expected that when a TFO submits the PCP Form to the AESO, the respective market participant supports the submission. The market participant may need to provide required inputs and sign-off on the PCP Form before it is submitted.
5. The AESO Project Manager will provide the TFO with the PCP Form number to prevent duplication.
6. The PCP Form requires signatures from the TFO and market participant, if applicable.
7. To submit the completed PCP Form including any necessary attachments, send an email to the AESO Project Manager and [transmission.projects@aeso.ca](mailto:transmission.projects@aeso.ca).
8. The AESO may have further questions or clarifications that arise during the AESO's review of the submitted PCP Form.

### Market Participant Instructions (not applicable to System Projects)

1. Each PCP Form should only document one project change. When there is more than one driver for change, each should be submitted as a separate PCP Form.
2. All required sections of the PCP Form should be completed and any supporting documentation necessary to support the change should be attached.
3. When a TFO is involved in the project, it is expected that when a market participant submits the PCP Form to the AESO, the respective TFO supports the submission. The TFO may need to provide required inputs and sign-off on the PCP Form before it is submitted.
4. The AESO Project Manager will provide the market participant with the PCP Form number to prevent duplication.
5. The PCP Form requires signatures from the market participant and TFO, if applicable.
6. To submit the completed PCP Form including any necessary attachments, send an email to the AESO Project Manager and [transmission.projects@aeso.ca](mailto:transmission.projects@aeso.ca).
7. The AESO may have further questions or clarifications that arise during the AESO's review of the submitted PCP Form.

# Project Change Proposals in the Cluster Assessment Process

## Project Change Proposals in Stage 1

The AESO will issue the Preliminary Assessment Packages on January 12, 2024. Upon review of the Preliminary Assessment Package, the market participant may wish to submit a PCP Form. The due date for PCP Form submission is January 26, 2024. The AESO is targeting to review the PCPs and approve or reject them within two weeks of receipt. No fees are applicable to PCP Forms in Stage 1.

The following changes are allowed:

- Decreases in energy or capacity parameters such as MC/STS/DTS/MARP
- Generation type or technology changes that do not increase the energy or capacity parameters such as MC/STS/DTS/MARP
- Power plant ownership changes (generating units/aggregated generating facilities within the power plant must have the same legal owner)
- Changes to grid connection date or generator/storage connection date that are within the cluster planning window (i.e. no later than August 31, 2028)
- Changes between Market Participant Choice (MPC) and non-MPC project types

The following changes are **not** allowed:

- Increases in energy or capacity parameters such as MC/STS/DTS/MARP
- Generation type or technology changes that increase the energy or capacity parameters such as MC/STS/DTS/MARP
- Changes to grid connection date or generator/storage connection date that are outside the cluster planning window (i.e. later than August 31, 2028)

The following changes will be assessed to determine if they will be allowed:

- Location changes (if the location change results in a change to the connection alternative, it will not be allowed)
- Other changes not included in the lists above (the AESO will use its discretion on a case-by-case basis to determine if the change will be allowed)

Note: If the market participant is submitting a PCP Form near the end of Stage 1 that results in a change to the generation model (e.g. capacity change, equipment changes such as wind turbine generator size change, inverter size revision for solar plant, addition of BESS in a wind or solar facility, or technology change), then an updated generation model (i.e. updated Stage 0 PDUP as outlined in the Stage 0-1-2 PDUP Supplement) must be submitted as an attachment to the PCP Form for review and use by the AESO in the Stage 1 and Stage 2 PDUP models. Any PDUP deficiencies identified by the AESO must be resolved by the market participant by the payment deadline for the detailed assessment fee.

## Project Change Proposals in Stage 2 and beyond

A PCP Form can be submitted after the AESO issues the Detailed Assessment Packages in Stage 2 and any time in the subsequent Stages. See the section above for an explanation of what changes are allowed.

A change assessment fee in the amount of \$10,000 + GST is required for each PCP Form that is submitted. See the Fee Guideline for more information.

A change assessment fee will **not** be incurred in the following instances:

- Changes to grid connection date or generator/storage connection date that are within the cluster planning window (i.e. no later than August 31, 2028)
- Changes to grid connection date or generator/storage connection date that are outside the cluster planning window due to AESO or TFO delays as determined on a case-by-case basis
- Power plant ownership changes (generating units/ aggregated generating facilities within the power plant must have the same legal owner)
- Changes between Market Participant Choice (MPC) and non-MPC project types

The AESO recognizes the variability of construction timelines, therefore, when a project is in Stage 5, ISD changes outside the cluster planning window may be considered. The change assessment fee will be incurred and the project will risk forfeiting a portion of the GUOC refund.

*Further detail and refinement of the process for PCPs submitted in Stage 2 and beyond will be added to this document closer to the end of Stage 2.*