



Alberta Electric System Operator

South and West Edmonton Area Transmission System Reinforcement Needs Identification Document

May 5, 2014

The Alberta Utilities Commission

Decision 2014-126: Alberta Electric System Operator
South and West Edmonton Area Transmission System Reinforcement
Needs Identification Document

Application No. 1609123
Proceeding No. 2303

May 5, 2014

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1 Introduction

1. In this decision, the Alberta Utilities Commission (AUC or the Commission) must decide whether to approve a needs identification document application (NID or needs application) that was filed by the Alberta Electric System Operator (AESO) for reinforcement of the 138-kilovolt (kV) transmission system south and west of the city of Edmonton.

2. The AESO submitted that its proposed reinforcement was necessary to meet forecasted load and generation growth in the south and west Edmonton area, and to avoid transmission reliability criteria violations. The AESO determined that the need could be met by developing two new 240/138-kV source substations, reconfiguring and rebuilding portions of the existing 138-kV transmission system, and modifying existing substations in the west, south and east of Edmonton. The NID described three alternatives developed by the AESO to reinforce the south and west Edmonton area transmission system and identified the AESO's preferred alternative.

3. No interested person argued that the AESO's assessment of the NID was technically deficient or that approval of the NID would not be in the public interest.

2 Background

2.1 The NID application and the hearing process and schedule

4. The AESO filed its NID application (Application No. 1609123) with the AUC on December 14, 2012, pursuant to Section 34 of the *Electric Utilities Act*. The NID described the need for transmission system reinforcement in the areas south and west of Edmonton, and described three alternatives, including its preferred alternative, to meet that need.

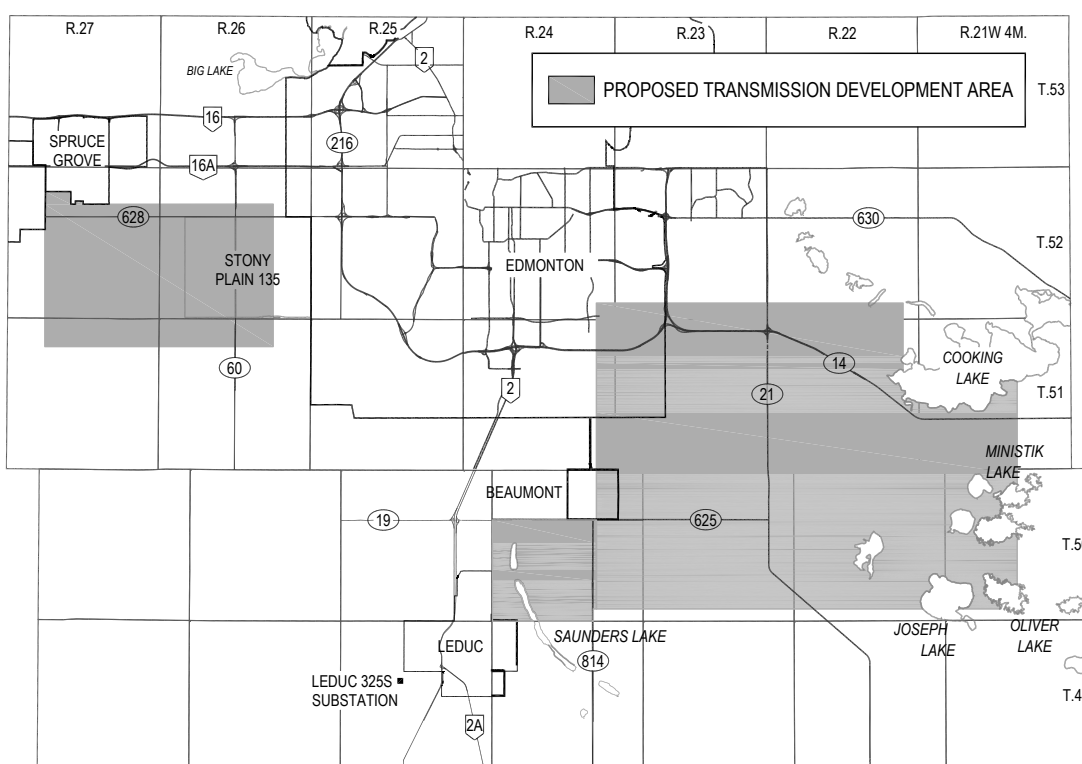
5. Alternative 1 proposed the construction of two new 240/138-kV substations: one near the town of Stony Plain to be called Harry Smith 367S and one near the city of Leduc to be called Saunders Lake 289S. It proposed the construction of a new 138-kV transmission line from the new Harry Smith 367S substation to the existing Devon 14S substation. It also proposed to reconfigure the 138-kV transmission system near the Cooking Lake 552S substation and to modify other substations in the area.

6. Alternative 2, the AESO's preferred alternative, also proposed the construction of the new Harry Smith 367S and Saunders Lake 289S substation, reconfiguration of the 138-kV transmission system near the Cooking Lake 522S substation and modification of other substations in the area. With Alternative 2, the new transmission line from Harry Smith 367S substation to the existing Devon 14S substation is not required, but a second 240/138-kV transformer at Saunders Lake 289S substation would be required.

7. Alternative 3 proposed the construction of two new 240/138-kV substations: the first one being Saunders Lake 289S substation as described above, the second one being designated as Legacy Park north of Stony Plain. This alternative proposed new 138-kV transmission lines to connect the Legacy Park substation to both the Stony Plain 434S substation and the Spruce Grove 595S substation. It also proposed a new 138-kV transmission line from Nisku 149S substation to Blackmud 155S substation. In addition, it proposed to reconfigure the 138-kV transmission system near the Cooking Lake 522S substation and to modify other substations in the area.

8. A map showing the proposed transmission development area for the preferred alternative is included below:

Figure 1. South and West Edmonton Transmission Reinforcement Project Area (Preferred Alternative)



9. The Commission issued information requests to the AESO on March 25, 2013. The AESO responded to the Commission's information requests on April 12, 2013.

10. The Commission issued a notice of application on April 29, 2013, with a deadline of May 22, 2013 to file submissions to the AUC. The notice of application was mailed or emailed directly to interested parties. This notice was also published on the AUC website and in a number of area newspapers.

11. A number of area residents filed statements of intent to participate in response to the notice of application. The concerns expressed by these residents included negative impacts on property valuation, negative impacts on the environment, and health and safety concerns. These residents also questioned the need for transmission reinforcement and asked for information on the routing and siting of the proposed transmission facilities.

12. On May 31, 2013, the AESO filed a letter¹ with the Commission, requesting that it defer further activities on Proceeding No. 2303 to allow the AESO to submit supplemental information. The AESO stated that AltaLink Management Ltd. (AltaLink) had expanded the area in which potential route options would be explored for the proposed Cooking Lake 138-kV transmission line development. The AESO also stated that it had initiated additional consultation activities and would submit supplemental consultation information when the consultation process was complete.

13. On October 9, 2013, the AESO filed supplemental information² in relation to its participant involvement program update and requested the Commission to resume the activities on Proceeding No. 2303. In addition, the AESO provided a set of maps for the Commission's consideration in the notice of hearing on October 10, 2013, and an additional map on November 5, 2013. The AESO submitted that it prepared these maps to highlight the areas where the proposed transmission system reinforcement may potentially occur.

14. The Commission issued a notice of hearing on November 7, 2013, in which it advised that a public hearing for the AESO needs application in Proceeding No. 2303 would be held in Edmonton on March 3, 2014. The notice of hearing was mailed or emailed directly to interested parties. The notice of hearing was also published on the AUC website and area newspapers. The AUC held an information session on Monday, December 2, 2013, in Edmonton, to assist interested parties in understanding the Commission's hearing process.

15. In response to the notice of hearing, the Office of Utilities Consumer Advocate (UCA) filed a statement of intent to participate³ on December 12, 2013. In its statement, the UCA questioned whether the approval of the application as filed was in the public interest. The UCA explained that its underlying concerns with the NID included the reliability of cost estimates, whether delaying the project start date would have some benefits and whether alternative designs would better serve the public interest. The Commission received submissions from additional interveners who had concerns or objections to the needs application.

16. On December 20, 2013, the Commission issued a ruling on standing in Proceeding No. 2303. In its ruling on standing, the Commission stated:

8. It is the Commission's view that approval of a need application has the potential to affect all Alberta electricity ratepayers as they bear the costs of new transmission facilities approved in conjunction with a needs identification document approval. Need applications also have the potential to affect those persons that own or occupy lands within those areas (sometimes referred to as swathes) of land identified by the AESO for the transmission options described in the need application.

17. The Commission granted standing to 27 individuals or families, the UCA and AltaLink Management Ltd. (AltaLink). A copy of the Commission's standing ruling is attached as Appendix A.

18. On January 28, 2014, the UCA filed a motion with the Commission seeking full and adequate responses to three information requests it had posed to the AESO. After hearing from the AESO on the motion, the Commission granted the motion in part, and required the AESO to

¹ Exhibit 0023.01.AESO-2303.

² Exhibit 0024.01.AESO-2303.

³ Exhibit 0038.00.UCA-2303.

provide a further response to one information request. A copy of the Commission's ruling on this motion is attached as Appendix B.

19. On February 6, 2014, Strathcona County filed a letter⁴ requesting that the Commission register Strathcona County as an intervener and consider the information provided with respect to the Beaver Hills area in its assessment of the AESO NID.

20. The Commission held a public hearing in its hearing room in Edmonton on March 3, 2014. The Commission panel that heard the application consisted of Tudor Beattie, QC (Panel Chair), Kay Holgate (Commission Member), and Clifford Goerz (Acting Commission Member).

21. The Commission considers that the record for this proceeding closed on March 3, 2014. Parties who registered at the hearing and their witness panels are identified in Appendix D.

2.2 The process for new transmission development in Alberta

22. Two approvals from the AUC are required to build new transmission facilities in Alberta: an approval of the need for expansion or enhancement to the system pursuant to Section 34 of the *Electric Utilities Act*, and a permit and licence to construct and operate a transmission line pursuant to sections 14 and 15 of the *Hydro and Electric Energy Act*.

23. The Alberta Electric System Operator (AESO, in its capacity as the Independent System Operator or ISO established under the *Electric Utilities Act*) is responsible for preparing a "needs identification document" (also known as a NID or a needs application) with the AUC pursuant to Section 34 of the *Electric Utilities Act*. In Decision 2004-087,⁵ the Commission's predecessor, the Alberta Energy and Utilities Board (EUB), described the NID process as:

It is the Board's view that section 34 contemplates a two-stage consideration of an NID. In the first stage, the Board must determine whether an expansion or enhancement of the capability of the transmission system is necessary to alleviate constraint, improve efficiency, or respond to a request for system access...

If it is determined that expansion or enhancement of the system is required to address constraint, inefficiency, system access requests, or any combination thereof, the Board must then assess, in the second stage, whether enhancement or expansion measures proposed by the AESO are reasonable and in the public interest.⁶

24. Section 38 of the *Transmission Regulation* provides the following guidance to the Commission in the exercise of its jurisdiction in considering a needs application:

38 When considering whether to approve a needs identification document under section 34(3) of the Act the Commission must:

(a) have regard for the principle that is in the public interest to foster

⁴ Exhibit 0057.00.STRATHCO-2303, registered in EPS on February 11, 2014.

⁵ Decision 2004-087: Alberta Electric System Operator, Needs Identification Document Application, Southwest Alberta 240-kV Transmission System Development, Pincher Creek – Lethbridge Area, Addendum to Decision 2004-075, Application No. 1340849, October 14, 2004.

⁶ Decision 2004-087: Alberta Electric System Operator, Needs Identification Document Application, Southwest Alberta 240-kV Transmission System Development, Pincher Creek – Lethbridge Area, Addendum to Decision 2004-075, Application No. 1340849, October 14, 2004., pages 13-14.

- (i) an efficient and competitive generation market,
 - (ii) a transmission system that is flexible, reliable and efficient and preserves option for future growth, and
 - (iii) geographic separation for the purposes of ensuring reliability of the transmission system and efficient use of land, including the use of rights of way, corridors or other routes that already contain or provide for utility or energy infrastructure or the use of new rights of way, corridors or other routes, notwithstanding that geographic separation for the purposes of ensuring reliability of the transmission system or efficient use of land may result in additional costs,
- (b) have regard for the following matters when it considers an application for a transmission facility upgrade or expansion, or operations preparatory to the construction of a transmission facility, namely, the contribution of the proposed transmission facility:
- (i) to improve transmission system reliability;
 - (ii) to a robust competitive market;
 - (iii) to improvements in transmission system efficiency;
 - (iv) to improvements in operational flexibility;
 - (v) to maintaining options for long term development of the transmission system;
 - (vi) to a project to which section 27 applies to provide system access service,
- (c) take into account the transmission system plan filed with the Commission,
- (d) take into account the ISO's responsibilities under any enactment, and
- (e) consider the ISO's assessment of the need to be correct unless an interested person satisfies the Commission that
- (i) the ISO's assessment of the need is technically deficient, or
 - (ii) to approve the needs identification document would not be in the public interest.

25. Section 34 of the *Electric Utilities Act* provides the Commission with three options for making a decision in regard to a NID. The Commission may approve or deny the NID, or it may refer the NID back to the AESO with suggestions or directions for changes or additions.

26. Facility applications are prepared by a transmission facility owner (TFO) assigned by the AESO. When considering an application for a transmission facility, the Commission must consider whether the proposed transmission facilities are in the public interest having regard for the social and economic effects of the transmission facilities and their effect on the environment. AltaLink has been assigned as the TFO by the AESO for the south and west Edmonton area transmission system reinforcement project.

3 The Commission's consideration of the south and west Edmonton area transmission system reinforcement NID application

27. As noted above, Section 38 of the *Transmission Regulation* provides guidance to the Commission in the exercise of its jurisdiction in considering a needs application.

28. Section 38 consists of two parts. The first part, subsections 38(a) through (d), lists specific principles, matters, documents and responsibilities that the Commission must have regard for or take into account when deciding whether to approve a NID. The second part, which consists of subsection 38(e), prescribes the two broad grounds, if raised by an interested party, upon which, the Commission may deny a NID application. The two parts are interrelated in that any decision under the second part subsection (38(e)) must be informed by the Commission's analysis of the considerations prescribed in the preceding subsections 38(a) through (d).

4 Need to expand or enhance the south and west Edmonton transmission system

4.1 Views of the AESO

29. In its NID, the AESO forecasted that the winter peak load in the Edmonton planning region was expected to grow from approximately 2,100-MW in 2011 to approximately 2,800-MW by 2022,⁷ with an annual growth rate of 2.6 per cent based on forecast residential, commercial and industrial development in the area. The AESO also forecasted generation in the region to grow from approximately 4,900-megawatts (MW) in 2011 to 5,200 MW by 2022. The AESO stated that, with the current 138-kV transmission system, a number of transmission reliability criteria violations were expected to occur by 2015. The AESO predicted that as load continues to grow in the area, the magnitude and severity of the transmission violations would continue to grow.

30. To identify the expected transmission criteria violations in the existing south and west Edmonton area 138-kV transmission system, the AESO performed power flow studies under normal and single contingency conditions using the AESO 2015 summer peak and winter peak base planning cases. The AESO explained that its power flow studies were conducted in accordance with Alberta Reliability Standards and the AESO transmission reliability criteria. The AESO stated that the studies identified a number of transmission reliability criteria violations under Category B contingencies.

31. Based on the power flow analysis of the existing transmission system for the year 2015, the AESO submitted that the existing transmission system would not have enough capacity to serve the projected load growth in the very near-term, and would not be adequate to serve projected load growth or proposed generation development by 2022. The AESO concluded that transmission system reinforcement is needed to alleviate the system constraints identified and to ensure that the transmission system is capable of serving forecasted load in compliance with the above-mentioned reliability criteria.

4.2 Views of the UCA

32. The UCA filed no evidence in the proceeding. During the hearing, the UCA cross-examined the AESO witnesses on the need for two 240-kV transformers at each of two

⁷ The AESO 2012 Long-term Outlook: http://www.aeso.ca/downloads/AESO_2012_Long-term_Outlook_bookmarked.pdf.

proposed source substations in the preferred alternative and the cost estimates in the NID. However, in argument, the UCA confirmed that it was not opposed to the NID application.

33. The UCA stated that the reason it decided to participate in this proceeding was that it was becoming increasingly concerned about the new transmission facility cost to the consumers that the UCA represents, especially dramatic cost escalations between the cost projected in the needs applications and cost estimation in the facility applications. To fulfill its legislated mandate, the UCA attempted to understand the level of reliability that should be afforded to the cost estimates for this NID application and the AESO's review process of costs and any projected cost increases that become apparent or are brought to its attention during the review process. The UCA also intended to enhance the transparency of the process and the amount of information on public record.

4.3 Views of Mr. Timothy Marceau and Ms. Fay Nilson

34. Mr. Marceau and Ms. Nilson filed no evidence in the proceeding. However, at the hearing, these interveners submitted questions related to the Cooking Lake 522S substation and the proposed 138-kV double-circuit transmission line between 138-kV transmission line 780L and Cooking Lake 522S substation to the Commission's counsel, who asked the AESO panel the questions on their behalf. Mr. Marceau and Ms. Nilson did not participate in argument.

4.4 Commission findings

35. Pursuant to subsection 38(e) of the *Transmission Regulation* the Commission must consider the AESO's assessment of need to be correct unless an interested party satisfies it that the ISO's assessment of the need is technically deficient, or that to approve the needs identification document would not be in the public interest.

36. To ensure the ongoing efficiency of the Alberta Interconnected Electric System (AIES), the AESO is mandated to plan a transmission system that is flexible and forward looking, and reasonably anticipates load increases and new generation. These obligations are set out in sections 5, 17 and 33 of the *Electric Utilities Act* and Section 38 of the *Transmission Regulation*. The AESO's obligations regarding reliability are set out in Section 15 of the *Transmission Regulation*. The AESO must make arrangements for system expansion or enhancement so that all anticipated in-merit electric energy can be dispatched without constraint under normal operating conditions.

37. The Commission understands that the AESO's load and generation forecast was premised upon forecast residential, commercial and industrial development in the area. The Commission finds that the AESO's process for forecasting load and generation was reasonable.

38. The Commission accepts the AESO's evidence that reliability criteria violations are predicted to occur in the south and west Edmonton 138-kV transmission system by 2015. As a result, the Commission is satisfied that transmission reinforcement is necessary to mitigate expected violations and accommodate the substantial load and generation growth forecast for that region.

39. Having reviewed the AESO's contingency analysis, the Commission agrees with the AESO that the existing transmission system in the south and west Edmonton area does not have adequate transmission capabilities to satisfy the predicted load growth and generation interconnection. The Commission also accepts that one consequence of inadequate transmission

capacity in the south and west Edmonton area would be the inability to supply increasing load demand and generation into the AIES without violation of the AESO transmission reliability criteria. The Commission, therefore, concludes that increased system capacity is required to ensure the continued development of a fair, open and competitive marketplace.

40. The Commission notes that neither the UCA nor Mr. Marceau and Ms. Nilson raised objections to the need for transmission system reinforcement in the south and west Edmonton area. In general, the statement of intent to participate (SIP)s filed by area residents with respect to Application No. 1609123, including the SIPs of Mr. Marceau and Ms. Nilson, centered around their concerns regarding negative impacts on property valuation, negative impacts on the environment, health and safety, the need for certain parts of transmission reinforcement and the exact routing and siting of reinforcement. The Commission is of view that, with exception of the need for transmission reinforcement, these concerns should be addressed at the facilities stage of a project. Regarding the concerns expressed about the need for the proposed facilities, the concerns expressed were general in nature and did not assist the Commission in assessing the technical sufficiency of the AESO's need assessment.

5 The AESO's preferred alternative

5.1 The preferred alternative

41. The AESO's preferred option, Alternative 2, consists of the following system developments:

New Harry Smith 367S, 240/138-kV substation:

- Construct a new 240/138-kV source substation, designated as Harry Smith 367S, with two 240/138-kV, 400-megavolt-ampere transformers and associated equipment.
- Add associated 240-kV and 138-kV transmission lines to connect Harry Smith 367S substation to existing lines 1043L and 739L and existing Acheson 305S substation.

New Saunders Lake 289S, 240/138-kV substation:

- Construct a new 240/138-kV source substation, to be designated Saunders Lake 289S, with two 240/138-kV 400-MVA transformers and associated equipment.
- Add associated 240-kV and 138-kV transmission lines to connect Saunders Lake 289S substation to existing lines 910L, 914L, 780L and 858L.
- Rebuild approximately two kilometres of 138-kV transmission lines 780L and 858L in the vicinity of the existing Nisku 149S substation.

Install a new 138-kV 27-MVAR capacitor bank at existing Leduc 325S substation.

Add two 138-kV circuits of approximately 25 kilometres from existing transmission line 780L (between East Edmonton 38S substation and Nisku 149S substation) to existing Cooking Lake 522S substation.

- Open transmission line 780L between two new circuits and connect two new circuits to the Cooking Lake 522S substation and the existing transmission line 174L outside Cooking Lake 522S substation.
- Disconnect transmission line 174L from Cooking Lake 522S substation.

Additional potential modifications to existing substations in the area including equipment or device changes as described in the application.

5.2 Views of the AESO

42. The AESO submitted that its evaluation included a comprehensive participant involvement program. The AESO stated that it conducted a variety of activities to notify, consult and engage residents, occupants, landowners, businesses, industry, First Nations, advocacy groups as well as elected and administrative municipal and provincial officials with interests in the south and west Edmonton area.

43. The AESO developed three transmission development alternatives, to consider in relation to the need to reinforce the south and west Edmonton area transmission system. The AESO undertook engineering studies to assess technical matters, made an economic comparison of the relative cost of the lines and undertook a land impact comparison in accordance with AUC Rule 007: *Applications for Power Plants, Substations, Transmission Lines, Industrial System Designations and Hydro Developments*.

5.2.1 Technical considerations comparison

44. The AESO conducted power flow, dynamic stability, voltage stability, and short-circuit analysis under system normal, single contingency and select double contingency conditions for performance of all three alternatives in the near-term (2015) using the AESO 2015 summer peak and winter peak planning base cases. The AESO submitted that the study results showed that all three alternatives would meet the AESO transmission reliability criteria and Alberta Reliability Standards in the near-term.

45. The AESO also conducted power flow, dynamic stability, voltage stability, and short-circuit analysis under system normal, single contingency and select double contingency conditions for performance of all three alternatives in the long-term (2022) by using the AESO 2022 summer peak and winter peak planning base cases. The AESO submitted that the study results confirmed that both Alternative 2 and Alternative 3 would meet the AESO transmission reliability criteria and Alberta Reliability Standards for the long-term assessment. However, Alternative 1 demonstrated an overload on 138-kV transmission line 739L for an outage of 240/138-kV transformer at the proposed Saunders Lake 289S substation.

46. The AESO also performed three sensitivity studies to assess the robustness and flexibility of alternatives 2 and 3 to accommodate planning uncertainty. The results of the studies demonstrated the capability of alternatives 2 and 3 to handle higher than forecast levels of load and generation and highlighted the relative robustness and expandability of each alternative.

5.2.2 Economic comparison

47. The AESO provided the estimated capital costs for all three alternatives as shown in Table 1.

Table 1. Estimated Capital Costs of Alternatives ($\pm 30\%$)

Alternative	Cost (in millions, 2015\$)
Alternative 1	\$190

Alternative 2	\$170
Alternative 3	\$200

48. The AESO also provided peak estimated losses for the AIES with each of the three alternatives in service listed in Table 2 below.

Table 2. Maximum peak hour AIES losses (MW) for simulated years (2015 and 2022)

Year	Existing (MW)	Alternative 1 (MW)	Alternative 2 (MW)	Alternative 3 (MW)
2015	339	325	325	326
2022	N/A	329	329	333

49. The AESO submitted that because the peak system losses associated with each of the three alternatives are similar, the relative transmission line loss between the alternatives would be negligible in economic terms and would not be a factor in selecting the preferred alternative.

5.2.3 Land impact comparison

50. Having regard to the land impact assessments conducted by AltaLink for the AESO, AltaLink concluded that while all three alternatives would traverse a similar landscape, have similar components and could be expected to have similar land impacts, Alternative 2 would likely have the least potential land impact due to its shorter line length, compatibility with current and future land use plans and less overall residential, visual and environmental impacts, followed by Alternative 3 and then Alternative 1.

51. As a result of the shorter line length, Alternative 2 would have fewer potential impacts to agricultural land use and agricultural land capability. The Harry Smith 367S substation, proposed in alternatives 1 and 2, is located in an area of class two agricultural land suitability, whereas the Legacy Park substation, proposed in Alternative 3, is located in an area of class two and class three agricultural land suitability. The agricultural land suitability classification system categorizes lands into seven classes, with class one being the most suitable for agriculture. The higher the class of a land, the less suitable it becomes for agricultural purposes. Therefore, the proposed Harry Smith 367S substation for alternatives 1 and 2 would have a higher agricultural land impact than the proposed Legacy Park substation for Alternative 3.

52. The Legacy Park substation, proposed in Alternative 3, would be located adjacent to the town of Stony Plain whereas the Harry Smith 367S substation, proposed in alternatives 1 and 2, would not be located near any urban area. The proximity of the proposed Legacy Park substation to an urban area would increase its potential residential and visual impacts in comparison to the Harry Smith 367S substation. Furthermore, since Alternative 1 would cross the North Saskatchewan River, the potential for recreational related visual impact is higher in Alternative 1. Therefore, alternatives 1 and 3 would have a greater residential and visual land impact than Alternative 2.

53. Based on the technical, economic and land impact assessments described above, the AESO concluded that Alternative 2 was the preferred alternative for the south and west Edmonton transmission system reinforcement.

54. At the hearing, in response to the UCA's question about the need for two 240/138-kV, 400-MVA transformers at each of the Harry Smith 367S substation and Saunders Lake 289S substation, the AESO explained that both of these substations would require two transformers in order to comply with Alberta reliability criteria.

55. To address the UCA's concern that the telecommunications facilities proposed in this NID might exceed the need, the AESO advised that it will review the telecommunications facilities proposed by AltaLink to ensure that they meet the AESO's functional requirements and represent a cost-effective solution.

56. Using the significant cost variance⁸ seen between the needs application and facility application in the Red Deer area transmission development (RDATD) project as an example, the UCA questioned what assurances the AESO and AltaLink could provide that the cost estimate for the south and west Edmonton area transmission system reinforcement project would not escalate in a fashion similar to the one experienced with the RDATD project.

57. Mr. Rihn, an AltaLink employee, provided evidence on behalf of the AESO with respect to cost variances between the needs application and the facilities application for the RDATD project. Mr. Rihn clarified that the cost increases seen in the Red Deer transmission development project were due to project-specific issues and provided a detailed explanation of the reasons. Mr. Rihn also explained that the common practice for preparation and review of cost estimates and indicated that the AESO and AltaLink did not anticipate a similar cost issue would arise with respect to the south and west Edmonton area transmission system reinforcement project.

58. The AESO was supportive of the position described by Mr. Rihn and indicated that they would work with AltaLink to understand the increase in costs, if any, between the cost estimate in the NID application and the cost estimate in the proposal to provide service. If there was a significant increase in the cost estimate between the NID and the proposal to provide services, the AESO indicated it would consider the possibility of reconfiguring the proposed facilities to mitigate the cost increases. The AESO further explained that a project would not be deferred as long as the need for transmission reinforcement existed. If a project escalated to a higher cost magnitude, the AESO would consider looking into different alternatives.

59. Mr. Marceau and Ms. Nilson's questions related to the need for the south and west of Edmonton area transmission system reinforcement project. Specific questions were why a new 138-kV transmission line would be required from the existing transmission line 780L to Cooking Lake 522S substation and why the Cooking Lake 522S substation was chosen. The AESO explained that it intended to introduce a new 240-kV source substation, Saunders Lake 289S, in the vicinity of the Nisku 149S substation, to enhance the 138-kV transmission system south and east of the Edmonton area. The AESO also proposed to split a large existing 138-kV looped transmission system in the area into two looped transmission systems by adding a new 138-kV double-circuit line from transmission line 780L to Cooking Lake 522S substation and reconfiguring line 780L.

⁸ Exhibit 0061.00.AESO-2303.

60. The AESO submitted that the large 138-kV looped system is currently supplied by two existing 240-kV source substations, East Edmonton 38S and Bigstone 86S. If one of these source substations were out of service, another substation and its associated 240-kV transmission lines would be overloaded. With the addition of the Saunders Lake 289S substation and the two looped systems, if one of three source substations were out of service, the other two source substations would be able to serve the 138-kV transmission system in the area without interruption. The Cooking Lake 522S substation was chosen because it would be in close proximity to the existing facilities and would introduce a 138-kV transmission line shorter in length. Furthermore, the two looped systems would provide a reasonable balance of transmission capacity for future growth.

61. Regarding the concerns expressed by Strathcona County in its letter dated February 6, 2014, AltaLink stated that a portion of the Cooking Lake 138-kV transmission line, proposed in all three alternatives, would be located within the Beaver Hills⁹ area. AltaLink further stated that it had discussed the routing of the Cooking Lake 138-kV transmission line with Strathcona County and would continue to consult with Strathcona County regarding routes and mitigation measures. The AESO stated that the information provided by Strathcona County informed its routing considerations of the alternatives at a high level. However, it submitted that the information would be more useful when doing the final siting and routing, and stated that the concerns raised could be mitigated in the siting and routing process.

5.3 Commission findings

62. The Commission considers that Strathcona County's concerns about the environmental impact of the proposed project on the Beaver Hills area can and should be addressed in the proceeding regarding the facility application.

63. The AESO considered three alternatives from technical, economic and land use impact perspectives. From a technical perspective, the results of the AESO's engineering studies indicated that Alternative 1 could not handle the forecast levels of load and generation in the long-term, while alternatives 2 and 3 could. The Commission accepts as reasonable the AESO's load and generation forecasts for the south and west Edmonton area. Further, the Commission accepts the testimony of Mr. Abdulsalam that the AESO is currently managing the performance of the transmission system south and west of Edmonton through real time operating measures.¹⁰ Based on the results of the load and generation forecasts, and the necessity of managing the performance of the transmission system south and west of Edmonton through real-time operating measures, the Commission concludes that there is a need for transmission reinforcement in the south and west Edmonton area.

64. From an environmental impact perspective, Alternative 1 was found to cross the North Saskatchewan River, an environmentally sensitive area, increasing its impact from both an environmental and recreational perspective. Alternative 1 was not considered further for these reasons.

65. From a technical perspective, Alternative 2 is superior to Alternative 3 in that it provides a more robust development, providing options for future expansion and flexibility to address higher than forecast load and/or generation development in the study horizon.

⁹ Exhibit 0060.00.ALTALINK-2303.

¹⁰ Transcript page 67 lines 4 to 10.

66. From an economic perspective the Commission observes that the estimated capital cost of Alternative 2, is \$30 million less than the estimated capital cost for Alternative 3. Further, it notes that Alternative 2 is shorter in line length than Alternative 3 and is therefore likely to have less land impact than Alternative 3 from environmental and recreational perspectives. The Commission accepts the AESO's evidence that the proposed Harry Smith 367S substation for Alternative 2 will have a higher agricultural land impact than the Legacy Park substation for Alternative 3. However, the proposed Legacy Park substation is adjacent to the Town of Stony Plain and, if approved, will have greater residential and visual land impacts than Alternative 2.

67. The Commission finds that the AESO's preferred alternative, Alternative 2, is preferable to Alternative 3 from technical, economic, environmental, recreational and visual perspectives but is less desirable from an agricultural perspective.

68. The Commission will consider the record of the proceeding relative to the direction provided in subsections 38(a) through 38(e) of the *Transmission Regulation*.

69. Based on the engineering studies undertaken by the AESO, the Commission finds that Alternative 2 for the transmission reinforcement in the south and west Edmonton area will contribute to an efficient and competitive generation market by allowing all existing and reasonably foreseeable new electric energy generation to be transmitted without constraint. The Commission finds that the criteria set out in Section 38(a) of the *Transmission Regulation* have been satisfied.

70. The Commission is satisfied that the criteria set out in Section 38(b) of the *Transmission Regulation* have also been met. The Commission finds that Alternative 2 will satisfy the AESO's transmission reliability criteria pertaining to system planning and will improve system reliability in the south and west Edmonton area. Approval of the Alternative 2 will further contribute to the competitive electricity market in Alberta. In the Commission's view, approval of Alternative 2 will contribute to system efficiency by accommodating new generation. Furthermore, the Commission is satisfied that Alternative 2 will improve operational flexibility and maintain options for future development of the transmission system.

71. With respect to subsections 38(c) and 38(d), the Commission finds that the need identified by the AESO in the NID is consistent with that identified in its 2012 Long-Term Transmission Plan, which was filed with the Commission. The Commission also finds that the NID is reflective of the AESO's duties pursuant to Section 17 of the *Electric Utilities Act* and consistent with the planning requirements prescribed by Section 15 of the *Transmission Regulation* respecting the AESO's responsibilities to plan the AIES and direct its safe, reliable and economic operation. The Commission finds that the requirements of subsections 38(c) and 38(d) of the *Transmission Regulation* have been satisfied.

72. Finally, with respect to subsection 38(e) of the *Transmission Regulation*, the Commission observes that no person asserted that the AESO's assessment of need is technically deficient or that approval of the NID would not be in the public interest.

73. Having considered the evidence filed by all participants, the Commission is satisfied that no interested person has demonstrated that the AESO's assessment of the need to expand and enhance the transmission system in the south and west Edmonton area is technically deficient or not in the public interest. The Commission is also satisfied that the preferred alternative is

superior to the other alternatives considered from technical, economic and land use impact perspectives.

74. Therefore, the Commission concludes that Alternative 2, the preferred alternative, of the AESO's proposed south and west Edmonton area transmission system reinforcement is consistent with the objectives of Section 5 of the *Electric Utilities Act* and the AESO's planning duties pursuant to Section 17 of that act.

6 Decision

75. Pursuant to Section 34(1) of the *Electric Utilities Act* and Section 38(e) of the *Transmission Regulation*, the Commission approves the NID with the preferred option, Alternative 2, as filed by the AESO, and grants the AESO the approval set out in Appendix 1 – Needs Identification Document Approval No. U2014-183 – May 5, 2014 (Appendix 1 will be distributed separately).

Dated on May 5, 2014.

The Alberta Utilities Commission

(original signed by)

Tudor Beattie, QC
Chair

(original signed by)

Kay Holgate
Commission Member

(original signed by)

Clifford Goerz
Commission Member

Appendix A – Copy of the Commission’s standing ruling



Appendix A Ruling on
standing - December
(consists of six pages)

Appendix B – Copy of the Commission’s ruling on motion



Appendix B Ruling on
UCA motion - February

(consists of three pages)

Appendix C – Proceeding participants

Name of organization (abbreviation) counsel or representative
Alberta Electric System Operator (AESO or ISO) D.G. Davies
AltaLink Management Ltd. B. Hunter K. McGlone
The Office of the Utilities Consumer Advocate T. Marriott
Strathcona County K. Kellgren
Town of Beaumont C. Levasseur
Wagner Natural Area Society P. Clayton
G. Vanstone
A. and D. Wronko
D. and S. Siegel
R. Zasada
B. Koch
W. Shield
K. Roy
K. and H. Makus
J. and N. Larsen

Name of organization (abbreviation) counsel or representative
S. Chartier
W. and D. Pettifer
J. Enright
W. and J. Woodward
K. Ogden
T. and L. Soch
T. Marceau
J. Charette
R. Rule and F. Nilson
V. and J. Petlikau
L. Mandrusiak
G. and G. Bienert
R. and C. Marshall
E. and I. Dugan
T. and N. LeRoux
K. Herbert

Appendix D – Oral hearing – registered appearances

Name of organization (abbreviation) counsel or representative	Witnesses
Alberta Electric System Operator(AESO or ISO) D.G. Davies	J. Doering S. Abdusalam L. Papworth
AltaLink Management Ltd. (AltaLink) B. Hunter K. McGlone	E. Rihn S. Heffernan
The Office of the Utilities Consumer Advocate T. Marriott	
T. Marceau and F. Nilson	

The Alberta Utilities Commission

Commission Panel

Tudor Beattie, QC, Chair

Kay Holgate, Commission Member

Clifford Goerz, Commission Member

Commission Staff

JP Mousseau (Commission counsel)

A. Chen

A. Ayri

Appendix E – Abbreviations

Abbreviation	Name in full
AESO	Alberta Electric System Operator (also the ISO)
AIES	Alberta Integrated Electric System
AUC	Alberta Utilities Commission
ISO	Independent System Operator
kV	Kilovolt
MVA	Megavolt-Ampere
NID	Needs Identification Document
TFO	Transmission Facility Owner
RDATD	Red Deer area transmission development
MW	megawatt
MVAR	megavolt-ampere-reactive

December 20, 2013

To: Interested parties

**Alberta Electric System Operator
South and West Edmonton Area Transmission Reinforcement
Needs Identification Document
Application No. 1609123
Proceeding ID No. 2303**

Ruling on standing and background information on approval process

1. In this letter, the Alberta Utilities Commission (AUC or the Commission) explains who is entitled to participate in Proceeding ID No. 2303. The letter also provides some general background on the approval process for new transmission projects in Alberta to help potential participants prepare for the hearing.

Background

2. Proceeding ID No. 2303 was convened to consider an application by the Alberta Electric System Operator (AESO) under Section 34 of the *Electric Utilities Act* for the need to reinforce the 138-kilovolt (kV) transmission system in Parkland County, Leduc County and Strathcona County, and could include parts of Camrose County and Beaver County.

3. The AESO's application describes why it believes there is a need to reinforce the system and describes its preferred alternatives to address that need. The AESO included maps with its application that show the general area in which its preferred alternatives would be constructed.

4. The AESO's application does not seek approval for the specific routing and siting of the transmission lines and substations described as its preferred alternatives. If the Commission decides to approve the AESO's application, the specific routing and siting of those facilities must be the subject of a second application to the AUC by AltaLink Management Ltd. (AltaLink).

5. A detailed description of the AUC's application process for new transmission facilities is found in paragraphs 12 to 20 of this letter.

Who can participate in the hearing?

6. The Commission issued a notice of hearing for this proceeding on November 7, 2013. In that notice, the Commission set December 13, 2013, as the deadline for interested persons to file a participation submission and issues list. Twenty-seven individuals or families filed participation submissions in response to the notice (see Schedule A). AltaLink and the Utilities Consumers Advocate also filed participation submissions.

7. Persons, including individuals and corporations, who may be directly and adversely affected by the Commission's decision on the AESO's application are entitled to participate in a public hearing. These persons are said to have standing to participate in the process.

8. It is the Commission's view that approval of a need application has the potential to affect all Alberta electricity ratepayers as they bear the costs of new transmission facilities approved in conjunction with a needs identification document approval. Need applications also have the potential to affect those persons that own or occupy lands within those areas (sometimes referred to as swathes) of land identified by the AESO for the transmission options described in the need application.

9. Having regard to the foregoing, the Commission finds that the 27 individuals or families listed in Schedule A have standing to participate in the proceeding because they are Alberta ratepayers and/or because they own lands within the areas identified by the AESO in its application as areas of proposed transmission development. Similarly, the Commission considers that the Utilities Consumer Advocate has standing to participate in the proceeding given its legislated mandate to represent the interests of Alberta residential, farm and small commercial consumers of electricity in proceedings before the Commission. The Commission also finds that AltaLink has standing to participate in the proceeding because the transmission development proposed in the AESO's application falls within AltaLink's service territory.

10. The Commission established the following process schedule for Proceeding ID No. 2303 in the notice of hearing:

Process step	Date
Information session	December 2, 2013, 7 p.m.
Interveners' participation submissions and issues lists deadline, including additional and updated submissions	December 13, 2013
Interveners' information requests (questions) to applicant deadline	January 3, 2014
Applicant's deadline to respond to information requests	January 13, 2014
Interveners' written evidence deadline	January 24, 2014
Information requests (questions) to interveners deadline	February 5, 2014
Interveners' deadline to respond to information requests	February 14, 2014
Applicant's reply evidence deadline	February 21, 2014
Commencement of hearing	March 3, 2014, 9 a.m.

11. Because intervenor information requests and submissions are due in January 2014, the Commission thought that it might be helpful to provide participants with some basic information about Alberta's two-stage approval process for new transmission projects. Most of the information in paragraphs 12 to 20 is substantially reproduced from AUC Decision [2013-369](#),¹ a recent decision of the Commission on proposed new transmission facilities in the Foothills area, south of Calgary.

¹ Decision 2013-369: Alberta Electric System Operator, AltaLink Management Ltd. and ENMAX Power Corporation – Foothills Area Transmission Development, Applications No. 1608620, No. 1608642, No. 1608637, No. 1608643, No. 1608649, No. 1608846, No. 1608861 and No. 1608862, Proceeding ID No. 2001, October 7, 2013.

The approval process for new transmission facilities in Alberta

12. Two approvals from the Commission are required to build new transmission facilities in Alberta. The first is an approval of the need for expansion or enhancement to the system pursuant to Section 34 of the [Electric Utilities Act](#). The second is a permit to construct and a licence to operate a transmission line pursuant to sections 14 and 15 of the [Hydro and Electric Energy Act](#).

13. Under the *Electric Utilities Act*, the AESO, in its capacity as the Independent System Operator (ISO), is responsible for preparing a document called a needs identification document or, more simply a need application. The need application describes the need for new transmission and proposes a transmission solution to meet that need. The AESO files the need application with the Commission for approval, pursuant to Section 34 of the *Electric Utilities Act*. The Commission may approve the need application, refer it back to the AESO with directions or suggestions for changes or additions, or refuse to approve the need application.

14. If the Commission approves the need application, the next step is the filing of an application for the specific siting, construction and operation of the new transmission facilities (this is generally referred to as a “facility” application). Facility applications are prepared by a transmission facility owner assigned by the AESO. When considering an application for a transmission facility, the Commission must consider whether the proposed transmission line is in the public interest having regard to the social and economic effects of the transmission line and the effect of the transmission line on the environment, pursuant to Section 17 of the [Alberta Utilities Commission Act](#).

Need applications

15. Section 33 of the *Electric Utilities Act* states in part:

33(1) The Independent System Operator must forecast the needs of Alberta and develop plans for the transmission system to provide efficient, reliable and non-discriminatory system access service and the timely implementation of required transmission system expansions and enhancements.

16. Section 34 of the *Electric Utilities Act* states in part:

34(1) When the Independent System Operator determines that an expansion or enhancement of the capability of the transmission system is or may be required to meet the needs of Alberta and is in the public interest, the Independent System Operator must prepare and submit to the Commission for approval a needs identification document that

- (a) describes the constraint or condition affecting the operation or performance of the transmission system and indicates the means by which or the manner in which the constraint or condition could be alleviated,
- (b) describes a need for improved efficiency of the transmission system, including means to reduce losses on the interconnected electric system, or
- (c) describes a need to respond to requests for system access service.

(2) On its own initiative or in response to views expressed by the Commission, the Independent System Operator may amend a needs identification document submitted to the Commission for approval.

17. Section 11 of the [Transmission Regulation](#), which describes the information that the AESO must include in a need application, specifies that it must include an assessment of current transmission capacity; load and generation forecasts; studies and analysis that identify the timing and nature of the need for new transmission; and a technical and economic comparison of the technical solutions considered by the AESO to address the need identified. Section 11 also requires a need application to state which technical solution the AESO preferred.

18. Section 38 of the *Transmission Regulation* describes what principles and matters the Commission must have regard for when deciding upon a need application. Subsection 38(e) requires the Commission to consider the AESO's assessment of the need to be correct unless an interested person satisfies the Commission that the assessment is technically deficient, or that approval of the need application would not be in the public interest. Subsection 38(e) states:

38 When considering whether to approve a needs identification document under section 34(3) of the Act the Commission must:

...

- (e) consider the ISO's assessment of the need to be correct unless an interested person satisfies the Commission that
 - (i) the ISO's assessment of the need is technically deficient, or
 - (ii) to approve the needs identification document would not be in the public interest.

19. The first need application considered by the Commission's predecessor, the Alberta Energy and Utilities Board (EUB or the Board), was for 240-kilovolt transmission upgrades between Pincher Creek and Lethbridge. The Board described the need assessment process as follows:

It is the Board's view that section 34 contemplates a two-stage consideration of a NID. In the first stage, the Board must determine whether an expansion or enhancement of the capability of the transmission system is necessary to alleviate constraint, improve efficiency, or respond to a request for system access.

If it is determined that expansion or enhancement of the system is required to address constraint, inefficiency, system access requests, or any combination thereof, the Board must then assess, in the second stage, whether enhancement or expansion measures proposed by AESO are reasonable and in the public interest.

20. The Commission has consistently followed this approach when deciding upon need applications.²

² EUB [Decision 2005-049](#): Alberta Electric System Operator Needs Identification Document Application Southwest Alberta 240-kV Transmission System Development Pincher Creek – Lethbridge Area, page 5; AUC [Decision 2009-126](#): Alberta Electric System Operator, Needs Identification Document Application Southern Alberta Transmission System Reinforcement, Application No. 1600862, Proceeding ID No. 171, September 8, 2009, page 1; [Decision 2010-188](#): Alberta Electric System Operator, Needs Identification Document Application Hanna Region Transmission System Development, Application No. 1605359, Proceeding ID No. 278, April 29, 2010, page 3.

21. The Commission hopes that the information contained in this letter has been helpful to you. If you have any questions with respect to this information or the hearing process in general please feel free to contact Ms. Annie Chen of the AUC's Facilities Division by email at annie.chen@auc.ab.ca or by phone at 403-592-4465 or Mr. JP Mousseau of the AUC's Law Division by email at jp.mousseau@auc.ab.ca or by phone at 403-592-4452.

Yours truly,

JP Mousseau
Commission Counsel

Schedule A – Persons and families with standing

Application No. 1609123: West, South and East Edmonton Area Transmission Reinforcement Needs Identification Document	
Vanstone, Glen	Ogden, Kelvin
Wronko, Allan and Doreen	Soch, Timothy and Laura
Siegel, Dennis and Susan	Marceau, Timothy
Zasada, Richard	Charette, Jennifer
Koch, Barb	Rule, Ron and Nilson, Fay
Shield, Wayne	Petlikau, Valerie and Juergen
Roy, Keith	Mandrusiak, Laura
Makus, Ken and Heather	Bienert, Glen and Gary
Larsen, Janice and Norman	Marshall, Ron and Claudette
Chartier, Susan	Dugan, Eugene and Ilona
Pettifer, William and Dorothy	LeRoux, Ted and Nancy
Enright, Justin	Herbert, Ken
Woodward, William and Jytte	

Schedule B – Others with standing

Application No. 1609123: West, South and East Edmonton Area Transmission Reinforcement Needs Identification Document	
AltaLink Management Ltd.	Wagner Natural Area Society
Town of Beaumont	Office of Utilities Consumer Advocate

February 13, 2014

To: Interested parties

**Alberta Electric System Operator
South and West Edmonton Area Transmission Reinforcement
Needs Identification Document (NID)
Application No. 1609123
Proceeding ID No. 2303**

Ruling on a motion by the Utilities Consumer Advocate for full and adequate answers from the Alberta Electric System Operator to three information requests

1. In this ruling, the Alberta Utilities Commission (AUC or the Commission) must decide whether to grant a motion by the Utilities Consumer Advocate (UCA) in which it sought full and adequate responses to three information requests directed by it to the Alberta Electric System Operator (the AESO). The UCA also asked the Commission to amend its process schedule for Proceeding ID No. 2303 to resolve the issues identified in its motion and to dispense with the requirement to file an affidavit in support of its motion.
2. The AESO opposed the motion and argued that the information sought by the UCA will not assist the Commission in evaluating the application before it.
3. The Commission has ruled on this motion and directed me to write to interested parties to advise them of its reasons for this ruling.

Background

4. The UCA filed its motion on January 28, 2014. The information requests that are the focus of the motion read as follows:

UCA-AESO-4 (a)

Please confirm the AESO's understanding of the total forecast cost of the project set out in the Red Deer Region NID (proceeding ID 1368) and the cost percent variance between the Red Deer Region NID and the total forecast costs of the RDATE [Red Deer Area Transmission Development] Facilities Applications 1607711, 1609677 and the best existing estimate of the costs of those identified as future filings outlined in the preamble.

UCA-AESO-4 (c)

Please provide a summary of the cost variances of each of the projects listed in Attachment UCA-AESO-4-2 in respect of the LTP project cost estimate, the NID project cost estimate, the project Facilities Application cost estimate and the project final as constructed cost. For projects that do not have a complete history of the 4 stages of cost, please provide the information available to date.

UCA-AESO-4 (d)

Please provide the transmission rate impact on Alberta residential, small commercial and farm utility customers for the total of all projects listed in Attachment UCA-AESO-4-1 totalling \$13,545M as forecast and the current forecast transmission rate impact for these same projects at their most current stage of forecast or determined cost.

5. The AESO's response to each of these information requests was: "The requested information is outside of the scope of this proceeding."¹
6. The UCA submitted that the information sought in these information requests is material and relevant to determining the reliability of the AESO's NID cost estimates and, in turn, whether approval of the NID is in the public interest. The UCA stated that it may rely on this information in argument and, while some of this information is on the public record, it is not on the public record of this proceeding.
7. The AESO replied to the UCA's motion on February 4, 2014. The AESO took the position that the information sought by the UCA is not relevant to Proceeding ID No. 2303. The AESO explained that the capital cost estimates used in its NID were prepared by AltaLink Management Ltd. for the purposes of comparing the alternatives available to meet the need identified in the NID. The AESO stated that it was open to the UCA to ask questions about these estimates at the hearing.
8. The AESO argued that comparing the cost estimates and as-constructed costs of other projects will not assist the Commission to evaluate the south and west Edmonton NID. The AESO observed that examining these costs would not be useful without examining the reasons for any cost changes that occurred after the various NID documents were approved. The AESO submitted that "[a] needed enhancement cannot be rejected at the NID stage based on a concern that the estimated cost of it might increase once detailed design and engineering, routing and siting, and consultation activities are conducted by the TFO".²
9. The AESO concluded that there are more appropriate forums to address the issue of cost variances between the NID stage and the facility construction stage, and noted that the UCA was pursuing a similar issue within the context of the Red Deer area transmission development project.
10. The UCA responded to the AESO's reply on February 5, 2014. The UCA stated that its information requests were intended to be a reasonable means to test the AESO's assertion that the cost estimates in the NID were prepared to an approximate accuracy of +/- 30 per cent. The UCA stated that it is not seeking cost information for the Red Deer area transmission development project because there is a link between it and the south and west Edmonton NID. Rather, it explained that it is seeking this information to understand if the cost overruns experienced for the Red Deer project may also occur in the south and west Edmonton project.

¹ Exhibit 49.01, UCA-AESO-4, page 11.

² Exhibit 55.01, Response of the Alberta Electric System Operator to the Motion of the Office of the Utilities Consumer Advocate, paragraph 7.

11. The UCA argued that the costs of a project described in a NID are relevant to the Commission's decision on a NID. It submitted that the Commission is required to examine a project's impact on ratepayers when determining if approval of a NID is in the public interest. The UCA submitted that if the Commission is not satisfied that the cost estimates included in a NID fall within the +/- 30 per cent range specified in AUC Rule 007: *Applications for Power Plants, Substations, Transmission Lines, and Industrial System Designations* then "the Commission may refer the NID back to the AESO with directions or suggestions or refuse to approve the NID."³

12. The UCA concluded that the information it seeks is relevant and should have been provided in response to its information requests. It asked the Commission to direct the AESO to fully respond to these requests at least one week prior to the start of the hearing, March 3, 2014.

Ruling

13. The Commission grants the motion in part by allowing the UCA's motion to proceed without filing an affidavit and by requiring the AESO to respond to UCA-AESO-4(a). In the Commission's view, the information requested in UCA-AESO-4(a) may be material and relevant to the proceeding to the extent that some link can be established between the NID estimates for the Red Deer area transmission development project and the NID estimates in this proceeding. Another factor that the Commission took into account was that the information sought by the UCA is likely on the public record and is easily available to the AESO.

14. In response to the UCA's request to amend the process schedule to accommodate the motion, the Commission directs the AESO to file the information requested in UCA-AESO-4(a) by no later than **Friday February 21, 2014**.

15. The Commission denies the UCA's request for full and adequate responses to UCA-AESO-4(c) and (d). The Commission finds that the UCA failed to demonstrate how the answers to these two requests would be material and relevant to the Commission's decision on the NID application. The Commission agrees with the AESO that the information sought by the UCA in response to these two information requests goes beyond the scope of the proceeding.

Regards,

JP Mousseau
Commission Counsel
Telephone: 403-592-4452
Email: jp.mousseau@auc.ab.ca

³ Exhibit 56.02, UCA Reply to Response to AESO, paragraph 12.