



Alberta Electric System Operator

**Application for Revised Adjusted Metering Practice
Implementation Plan and Related Amendments to
Independent System Operator Tariff and Rules**

November 27, 2023

Alberta Utilities Commission

Decision 28441-D01-2023

Alberta Electric System Operator

Application for Revised Adjusted Metering Practice Implementation Plan and Related
Amendments to Independent System Operator Tariff and Rules

Proceeding 28441

November 27, 2023

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1 Decision summary

1. For the reasons set out in this decision, the Alberta Utilities Commission approves the Alberta Electric System Operator’s (AESO) request to revise certain sections of the Independent System Operator (ISO) tariff related to totalized billing¹ of multiple points of delivery or points of supply at the same substation.

2 Introduction and background

2. On August 31, 2023, the AESO submitted an application to the Commission, pursuant to sections 20, 30 and 119(4) of the *Electric Utilities Act*, requesting approval of a revised implementation plan for its adjusted metering practice (AMP) and related amendments to the ISO tariff and rules.²

3. These amendments included revisions to Section 8(1) of Rate DTS (demand transmission service); Section 3(1) of Rate PSC (primary service credit) and Rate STS (supply transmission service); Section 10.3(2) of the terms and conditions of the ISO tariff; and new sections 10.4(1) and 10.4(2) of the terms and conditions of the ISO tariff, to permit totalized billing of multiple points of delivery or points of supply at the same substation (totalized billing revisions). The AESO requested that the totalized billing revisions be approved no later than December 1, 2023, with immediate effect.

4. On October 4, 2023,³ the Commission closed the record on the issue of the totalized billing revisions and advised that it would proceed to a decision on the revisions.

5. This decision deals only with the AESO’s requested totalized billing revisions. The Commission will issue a second decision at a later date with its determination on the remainder of the AESO’s application.

¹ In Exhibit 28441-X0002.01, AMP and Related Amendments to ISO Tariff and Section 503.17 Application, the AESO explained totalized billing as follows: “Totalized billing is an ISO tariff settlement mechanism for cases where a single market participant receives system access service (SAS) through multiple points of connection. This mechanism allows the AESO to combine a market participant’s billing for the same SAS at multiple points of connection (but limited to the circumstances set out in Section 10 of the ISO tariff) so that they receive fewer bills for that service.”

² Exhibit 28441-X0002.01, AMP and Related Amendments to ISO Tariff and Section 503.17 Application.

³ Exhibit 28441-X0064, AUC letter - Ruling on process for totalized billing revisions.

3 Should the Commission approve the AESO's totaled billing revisions?

6. The current totaled billing provisions in the ISO tariff were approved in Decision 22942-D02-2019⁴ and specify that totaled billing is applicable to points of delivery (or points of supply) at separate substations.

7. The AESO proposed the totaled billing revisions to permit the totalization of feeder flows under the same service (e.g., Rate DTS or Rate STS), at the same substation, because: (i) multiple points of delivery (or points of supply) can exist within the same substation; (ii) the current totaled billing provisions lack clarity regarding whether and how totaled billing within the same substation is permitted; (iii) it would be administratively inefficient if the AESO was required to separately contract and bill for DTS or STS at each point of delivery or point of supply within a substation; and (iv) not allowing the totalization of multiple points of supply in a substation would create a barrier that limits the ability of a market participant to aggregate some or all of its transmission-connected generating units.⁵

8. The proposed revisions were not contentious in this proceeding. The Commission provided parties the opportunity to comment on the revisions, and received comments that were either supportive of, or not opposed to, the revisions.⁶

9. The Commission approves the AESO's proposed totaled billing revisions as filed. The Commission finds that the proposed revisions, which are largely administrative in nature, will improve the clarity of the ISO tariff, provide more flexible and efficient contracting options and streamline AESO billing procedures.⁷

4 Order

10. It is hereby ordered that:

- (1) The Alberta Electric System Operator's totaled billing revisions are approved as filed and shall have immediate effect.

Dated on November 27, 2023.

⁴ Decision 22942-D02-2019: Alberta Electric System Operator, 2018 Independent System Operator Tariff, Proceeding 22942, September 22, 2019.

⁵ Exhibit 28441-X0002.01, AMP and Related Amendments to ISO Tariff and Section 503.17 Application, PDF page 15, paragraphs 51-56.

⁶ Exhibit 28441-X0040, Capital Power Statement of Intent to Participate; Exhibit 28441-X0043, Letter_to_AUC_-_DCG_Consortium_SIP - September 12, 2023, PDF page 3; Exhibit 28441-X0054, UCA [Office of the Utilities Consumer Advocate] Submission on Process; Exhibit 28441-X0055, Versorium response on totaled billing revisions; and Exhibit 28441-X0056, CCA [Consumers' Coalition of Alberta] Comments on Process – 28441, PDF page 1 paragraphs 1-2.

⁷ Exhibit 28441-X0040, Capital Power Statement of Intent to Participate, PDF page 1; and Exhibit 28441-X0055, Versorium response on totaled billing revisions.

Alberta Utilities Commission

(original signed by)

Douglas A Larder, KC
Vice-Chair

(original signed by)

Vincent Kostas
Acting Commission Member

Appendix 1 – Proceeding participants

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Alberta Electric System Operator (AESO) McCarthy Tetrault
AltaLink Management Ltd.
BluEarth Renewables Inc. Blake, Cassels & Graydon LLP
Capital Power Corporation
City of Lethbridge Chymko Consulting Ltd.
Consumers' Coalition of Alberta (CCA) J. Wachowich, KC
DCG Consortium Blake, Cassels & Graydon LLP
Elemental Energy Renewables Inc. Blake, Cassels & Graydon LLP
ENMAX Power Corporation
FortisAlberta Inc.
Lionstooth Energy
Office of the Utilities Consumer Advocate
RWE Canada Ltd. Blake, Cassels & Graydon LLP
The City of Red Deer Chymko Consulting Ltd.
University of Alberta Chymko Consulting Ltd.

Name of organization (abbreviation)
Company name of counsel or representative

Versorium Energy Ltd.

Alberta Utilities Commission

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