

**In the Matter of the Need for the Enterprise Solar Project Connection**

**And in the matter of the *Electric Utilities Act*, S.A. 2003, c. E-5.1, the *Alberta Utilities Commission Act*, S.A. 2007, c. A-37.2, the *Hydro and Electric Energy Act*, R.S.A. 2000, c. H-16, the Regulations made thereunder, and *Alberta Utilities Commission Rule 007***

Application of the Alberta Electric System Operator for Approval of the  
Enterprise Solar Project Connection  
Needs Identification Document

**Date:** August 20, 2021

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**PART A - APPLICATION**

**1 Introduction**

**1.1 Application** – Pursuant to Section 34(1)(c) of the *Electric Utilities Act* (Act), and in accordance with further provisions set out in legislation,<sup>1</sup> the Alberta Electric System Operator (AESO) applies to the Alberta Utilities Commission (Commission) for approval of the *Enterprise Solar Project Connection Needs Identification Document* (Application). This application is submitted in accordance with AUC Rule 007, Section 6.2.2, *ISO Abbreviated Needs Identification Document Application Information Requirements for System Access Service Requests by Generators*.

**1.2 Application Overview** – The market participant, Enterprise Solar GP Inc. (Enterprise Solar), on behalf of Enterprise Solar LP, has requested system access service to connect its approved Enterprise Solar Project<sup>2</sup> (the Facility) to the transmission system in the Stavely area (AESO Planning Area 49). The Facility includes the approved Enterprise 1070S collector substation. Enterprise expects the Facility to be commercially operational in December 2022.

Enterprise’s request includes a new Rate STS, *Supply Transmission Service*, contract capacity of 65 MW and a new Rate DTS, *Demand Transmission Service*, contract capacity of 1 MW. Enterprise’s request indicated their intention to submit a proposal to construct and to temporarily operate some transmission facilities, as contemplated in Section 24.31 of the *Transmission Regulation* (TReg). Enterprise’s request can be met by adding one 138 kilovolt (kV) circuit to connect the Facility to the existing 138 kV transmission line 161L using a T-tap configuration (the Proposed Transmission Development, as further described in Section 2.2). The scheduled in-service date for the Proposed Transmission Development is August 31, 2022.

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<sup>1</sup> The *Alberta Utilities Commission Act*, S.A. 2007, c. A-37.2, the *Hydro and Electric Energy Act*, R.S.A. 2000, c. H-16, the Regulations made thereunder, and Alberta Utilities Commission Rule 007 (AUC Rule 007).

<sup>2</sup> Decision 26322-D01-2021: Enterprise Solar GP Inc. – Enterprise Solar Project, Proceeding 26322, Applications 26322-A001 and 26322-A002, February 14, 2021.

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This Application describes the need to respond to Enterprise’s request for system access service, and the AESO’s determination of the manner in which to respond to the request. Having followed the AESO Connection Process,<sup>3</sup> the AESO has determined that the Proposed Transmission Development provides a reasonable opportunity for Enterprise to exchange electric energy and ancillary services. The Proposed Transmission Development is consistent with the AESO’s long-term plans for the South Planning Region, which includes the Stavely area. The AESO submits this Application to the Commission for approval in accordance with the AESO’s responsibility to respond to requests for system access service and having determined that transmission development is required and is in the public interest.<sup>4,5</sup>

**1.3 Market Participant Proposal** – Enterprise submitted a proposal to the AESO, pursuant to Section 24.31 of the TReg (Market Participant Proposal), for the construction and temporary operation of a transmission facility, specifically the Proposed Enterprise Development defined in Section 2.2 below.

A completed Market Participant Proposal was submitted by Enterprise on August 9, 2021. Subsequently, on August 20, 2021, the AESO conditionally approved the Market Participant Proposal pursuant to Section 36 of the Act, and in accordance with Section 35(1)(b) of the Act, specified the time within which Enterprise was to submit, for Commission approval under the *Hydro and Electric Energy Act* (HEEA), a transmission facility proposal<sup>6</sup> (Facility Proposal) for the Proposed Enterprise Development.

**1.4 AESO Directions to the TFO** – During the AESO Connection Process, the AESO issued various directions to the legal owner of transmission facilities (TFO), in this case, AltaLink Management Ltd. (AltaLink), in its capacity as general partner of AltaLink L.P.,

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<sup>3</sup> For information purposes, refer to note iv of Part C of this Application for more information on the AESO Connection Process.

<sup>4</sup> For information purposes, some of the legislative provisions relating to the AESO’s planning duties and duty to provide system access service are referenced in notes i and ii of Part C of this Application.

<sup>5</sup> Note v of Part C of this Application describes the Application scope in more detail.

<sup>6</sup> Also referred to as facility application under AUC Rule 007.

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including direction to submit, for Commission approval under the HEEA, a Facility Proposal for the Proposed AltaLink Development, as defined in Section 2.2.<sup>7</sup>

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<sup>7</sup> The directions are described in more detail in the following sections of this Application and in Part C, note vi.

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**2 Need Overview and Proposed Transmission Development**

**2.1 Duty to Provide Transmission System Access Service** – The AESO, pursuant to its responsibilities under Section 29 of the Act, must provide system access service on the transmission system in a manner that gives all market participants a reasonable opportunity to exchange electric energy and ancillary services.

The AESO, in consultation with Enterprise and AltaLink, has determined that the Proposed Transmission Development is the preferred option to provide Enterprise with a reasonable opportunity to exchange electric energy and ancillary services. In accordance with Section 34 of the Act, the AESO has determined that the Proposed Transmission Development will result in an expansion or enhancement of the transmission system thereby establishing the need for this Application. Enterprise has made the appropriate applications to the AESO to obtain transmission system access service.

Through the AESO Connection Process, the AESO, in consultation with Enterprise and AltaLink, has determined the Proposed Transmission Development and has assessed the impacts that the Proposed Transmission Development and the associated generation would have on the Alberta interconnected electric system. The City of Lethbridge, in its capacity as a legal owner of transmission facilities, (Lethbridge), has a small scope of work described below (Section 2.2 C) for which it has determined that a transmission facility proposal is not required.

**2.2 Proposed Transmission Development** – The Proposed Transmission Development involves connecting the Facility to the transmission system, and consists of:<sup>8</sup>

- A. The Proposed Enterprise Development, which includes transmission facilities that, as contemplated by Section 24.31 of the TReg, will be constructed by

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<sup>8</sup> Details and configuration of equipment required for the Proposed Transmission Development, including substation single-line diagrams, are more specifically described in the AESO's Functional Specification included in Enterprise's Facility Proposal and AltaLink's Facility Proposal. Also, further details will be determined as detailed engineering progresses and Enterprise's operating requirements are finalized. Routing and/or siting of transmission facilities do not form part of this Application and are addressed in Enterprise's Facility Proposal and AltaLink's Facility Proposal. Line numbering and substation names provided here are for ease of reference and are subject to change as engineering and design progresses. Enterprise facilities that may subsequently be connected to the Proposed Transmission Development are the responsibility of Enterprise and are not included in the Application.

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Enterprise, and, thereafter, jointly operated by Enterprise and the TFO for a temporary period of time specified in the Market Participant Proposal;<sup>9</sup> and

### **B. The Proposed AltaLink Development.**

The scope of the Proposed Enterprise Development and the Proposed AltaLink Development is described further below.

#### **A. The Proposed Enterprise Development:**

1. Add one 138 kV circuit, approximately 40 meters in length, with a minimum capacity no less than the capacity of the existing 138 kV transmission line 161L which is 117 MVA, to connect the Facility to the existing 138 kV transmission line 161L using a T-tap configuration;<sup>10</sup> and
2. Modify, alter, add or remove equipment, including switchgear, and any operational, protection, control and telecommunication devices required to undertake the work as planned and ensure proper integration with the transmission system.

#### **B. The Proposed AltaLink Development:**

1. Modify, alter, add or remove equipment, including switchgear, and any operational, protection, control and telecommunication devices required to undertake the work as planned and ensure proper integration with the transmission system.

#### **C. Proposed Lethbridge Development**

1. Add telecom equipment at the existing Bowron 674S substation; and
2. Modify, alter, add or remove other equipment, including switchgear, and any

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<sup>9</sup> Where the AESO approves a proposal per section 24.31(7) of the TReg, Enterprise and the incumbent TFO must, (a) before applying for any permit, licence or approval under the HEEA to construct or operate the transmission facility, enter into a written agreement under which ownership of the transmission facility will transfer from Enterprise to the incumbent TFO on the expiry of the temporary period referred to in subsection (3)(c) of the TReg.

<sup>10</sup> The 138 kV circuit will connect to Enterprise's approved Enterprise 1070S substation, which is part of the Facility. Enterprise has estimated that the 138 kV circuit will have a length of approximately 40 meters. This is subject to change as routing and/or siting is finalized by Enterprise.

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operational, protection, control and telecommunication devices required to undertake the work as planned and ensure proper integration with the transmission system.<sup>11</sup>

**2.3 Proposed Transmission Development Cost Estimate** – Enterprise has prepared a cost estimate for the Proposed Enterprise Development, described in Section 2.2. The AESO also directed AltaLink to prepare a cost estimate for the Proposed AltaLink Development described in Section 2.2.

Enterprise has estimated the cost of the Proposed Enterprise Development to be approximately \$0.2 million.<sup>12</sup> AltaLink has estimated the cost of the Proposed AltaLink Development to be approximately \$4 million.<sup>1314</sup>

In accordance with the ISO tariff, the AESO has determined that all costs associated with the Proposed Transmission Development will be classified as participant-related.

**2.4 Transmission Development Alternatives** – In addition to the Proposed Transmission Development, the AESO, in consultation with Enterprise and AltaLink, examined ten other transmission development alternatives to respond to Enterprise’s request for system access service:

- 1. In-and-Out Connection to 240 kV Transmission Lines 1037L or 1038L** – This alternative involves connecting the Facility to the existing 240 kV transmission lines 1037L or 1038L using an in-and-out configuration. This alternative would require the addition of a switching station, including three 240 kV circuit breakers and the addition of one 240 kV circuit, approximately 21 kilometers in length

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<sup>11</sup> Lethbridge has advised that this is the scope of work that would be required to meet the AESO’s Functional Specification. Since Lethbridge will not be providing a Facility Proposal, an additional level of detail has been provided for the Lethbridge scope of work.

<sup>12</sup> The cost is in nominal dollars using a base year of 2022 with escalation considered. Further details of this cost estimate, which has an accuracy level of +20%/-10%, can be found in Appendix B.

<sup>13</sup> The cost is in nominal dollars using a base year of 2021 with escalation considered. Further details of this cost estimate, which has an accuracy level of +20%/-10%, can be found in Appendix B.

<sup>14</sup> Lethbridge’s cost estimate was not available at the time of filing.

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2. **Radial 240 kV Connection to Foothills 237S substation** – This alternative involves connecting the Facility to the existing Foothills 237S substation using a radial 240 kV configuration. This alternative requires the addition of one 240 kV circuit, approximately 37 kilometers in length, and modifying the Foothills 237S substation, including adding one 240 kV circuit breaker.
3. **In-and-Out Connection to 240 kV Transmission Line 1036L** – This alternative involves connecting the Facility to the existing 240 kV transmission line 1036L using an in-and-out configuration. This alternative would require the addition of a switching station, including three 240 kV circuit breakers and the addition of one 240 kV circuit, approximately 40 kilometers in length.
4. **In-and-Out Connection to 240 kV Transmission Line 1005L** – This alternative involves connecting the Facility to the existing 240 kV transmission line 1005L using an in-and-out configuration. This alternative would require the addition of a switching station, including three 240 kV circuit breakers and the addition of one 240 kV circuit, approximately 40 kilometers in length.
5. **Radial 240 kV Connection to Milo 356S substation** – This alternative involves connecting the Facility to the existing Milo 356S substation using a radial 240 kV configuration. This alternative requires the addition of one 240 kV circuit, approximately 43 kilometers in length, and modifying the Milo 356S substation, including adding one 240 kV circuit breaker.
6. **Radial 240 kV Connection to Travers 554S substation** – This alternative involves connecting the Facility to the existing Travers 554S substation using a radial 240 kV configuration. This alternative requires the addition of one 240 kV circuit, approximately 50 kilometers in length, and modifying the Travers 554S substation, including adding one 240 kV circuit breaker.
7. **T-tap Connection to 138 kV Transmission Line 180L** – This alternative involves connecting the Facility to the existing 138 kV transmission line 180L using a T-tap configuration. This alternative would require the addition of one



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138 kV circuit, approximately 0.4 kilometers in length, and crossing the existing 138 kV transmission line 161L.

8. **Radial 138 kV Connection to Vulcan 255S substation** – This alternative involves connecting the Facility to the existing Vulcan 255S substation using a radial 138 kV configuration. This alternative requires the addition of one 138 kV circuit, approximately 6 kilometers in length, and modifying the Vulcan 255S substation, including adding one 138 kV circuit breaker.
9. **Radial 138 kV Connection to Blackie 253S substation** – This alternative involves connecting the Facility to the existing Blackie 253S substation using a radial 138 kV configuration. This alternative requires the addition of one 138 kV circuit, approximately 26 kilometers in length, and modifying the Blackie 253S substation, including adding one 138 kV circuit breaker.
10. **Radial 138 kV Connection to Queenstown 504S substation** – This alternative involves connecting the Facility to the existing Queenstown 504S substation using a radial 138 kV configuration. This alternative requires the addition of one 138 kV circuit, approximately 33 kilometers in length, and modifying the Queenstown 504S substation, including adding one 138 kV circuit breaker.

All of the above alternatives were ruled out due to increased transmission development, and hence overall increased cost, compared to the Proposed Transmission Development. The Proposed Transmission Development was selected as the preferred transmission alternative and forms the basis for the cost estimates and the connection assessment described herein.

**2.5 Connection Assessment** – Power flow, transient stability and short-circuit studies were conducted to assess the impact that the Proposed Transmission Development and the associated generation would have on the transmission system. Power flow and short-circuit studies were conducted prior to and following the connection of the Proposed

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Transmission Development, and transient stability studies were performed following connection of the Proposed Transmission Development.<sup>15</sup>

The pre-connection assessment identified some system performance issues. Under certain Category B conditions, thermal criteria violations were observed. The following mitigation measures can be used to mitigate the pre-connection system performance issues:

- real-time operational practices;
- planned RAS 174; and
- planned RAS 178.<sup>16</sup>

All of the system performance issues identified in the pre-connection assessment were also identified in the post-connection assessment, and new system performance issues were observed. Under certain Category B conditions, most of the thermal criteria violations that were observed in the pre-connection assessment were exacerbated in the post-connection assessment and new thermal criteria violations were observed. The following mitigation measures can be used to mitigate the post-connection system performance issues:

- real-time operational practices;
- modify existing RAS 169; and
- modify planned RAS 174 and RAS 178.

The connection assessment also identified the potential for thermal criteria violations under the Category A condition, as certain facilities were observed to be approaching thermal loading limits. Should Category A thermal criteria violations materialize, the AESO will use operational procedures or other mitigation measures, to reduce the system

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<sup>15</sup> The connection assessment is included as Appendix A.

<sup>16</sup> Planned RAS 178 was included as part of the Claresholm Solar Project Connection, as originally approved by AUC Decision 24679-D01-2019 and NID Approval 24679-D02-2019.

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performance issues to acceptable levels, which may include the application of Section 302.1 of the ISO rules, *Real Time Transmission Constraint Management* to dispatch down effective generation. If the AESO determines in the future that congestion is reasonably anticipated to arise, the AESO will make an application to the Commission to obtain approval for an exception under Section 15(2) of the *Transmission Regulation* and include the AESO's mitigation plan within the application. The AESO will notify market participants if and when the AESO determines that it is necessary to apply to the Commission for approval of such an exception.

**2.6 Transmission Dependencies** – The Proposed Transmission Development does not require the completion of any other AESO plans to expand or enhance the transmission system prior to connection.

**2.7 AESO Participant Involvement Program** – The AESO directed AltaLink to assist the AESO in conducting the AESO's participant involvement program (PIP). The AESO also required Enterprise to assist the AESO in conducting the AESO's PIP as a condition to the AESO's approval of the Market Participant Proposal.

Between March and July 2021, AltaLink, Enterprise and the AESO used various methods to notify stakeholders about the need for development and the AESO's preferred option to respond to the system access service request. This included a notification to market participants that may be affected by the Proposed Transmission Development. The AESO has responded to the questions and concerns raised by one of the notified market participants. Another notified market participant requested a meeting with the AESO on August 30, 2021 to discuss the engineering studies included in this NID application. No other questions or concerns have been raised by the other notified market participants.

Apart from the inquiries above, there are no outstanding concerns or objections regarding the need for the Proposed Transmission Development or the AESO's preferred option to

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respond to the system access service request. In August 2021, the AESO notified stakeholders of its intention to file this Application with the Commission.<sup>17</sup>

**2.8 Environmental and Land Use Effects**– The AESO has been advised that both the AltaLink Facility Proposal and Enterprise Facility Proposal address the environmental and land use effects requirements of AUC Rule 007, Section 6.2.2, NID23(3).<sup>18</sup> In consideration of this fact, and as the filing of the Application is combined with both the AltaLink Facility Proposal and Enterprise Facility Proposal, the AESO has not undertaken a separate assessment of the sort contemplated in AUC Rule 007, Section 6.2.2, NID23(3).

**2.12 Confirmation Date** – In the event that the Proposed Transmission Development is not in service by August 31, 2022, which is the scheduled in-service date, the AESO will determine if the need to expand or enhance the transmission system described in this Application continues, and if the technical solution described in this Application continues to be the AESO’s preferred technical solution. In addition, in the event that the AESO believes that the in-service date will not be met, and such delay will have a material impact on this Application, the AESO will advise the Commission of the same.

The AESO has been advised that both AltaLink’s Facility Proposal and Enterprise’s Facility Proposal address the requirements of AUC Rule 007, Section 6.2.2, NID25(2).<sup>19</sup> In consideration of this fact, and as the filing of this Application is combined with both AltaLink’s Facility Proposal and Enterprise’s Facility Proposal, the AESO has not undertaken an implementation schedule of the sort contemplated in AUC Rule 007, Section 6.2.2, NID25(2).

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<sup>17</sup> Further information regarding the AESO’s PIP for this Application is included in Appendix C.

<sup>18</sup> Please refer to the letters included as Appendix D of this Application.

<sup>19</sup> *Ibid.*

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**2.13 Approval is in the Public Interest –** Having regard to the following:

- the transmission planning duties of the AESO as described in Sections 29, 33 and 34 of the Act;
- Enterprise’s request for system access service and the AESO’s assessment thereof;
- the AESO’s connection assessment;
- the cost estimates for the Proposed AltaLink Development and the Proposed Enterprise Development;
- AltaLink’s and Enterprise’s confirmation that AUC Rule 007, Section 6.2.2, NID23(3) has been addressed;
- information obtained from AESO PIP activities; and
- the AESO’s long-term transmission system plans;

it is the conclusion of the AESO that the Proposed Transmission Development provides a reasonable opportunity for Enterprise to exchange electric energy and ancillary services. In consideration of these factors, the AESO submits that approval of this Application is in the public interest.

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**3 Request to Combine this Application with the Facility Proposals for Consideration in a Single Process**

3.1 Pursuant to Subsection 35(1) of the Act, the AESO has directed AltaLink to prepare a Facility Proposal corresponding with this Application. Pursuant to Section 36 of the Act, the AESO has conditionally approved the Market Participant Proposal.

The AESO understands that the AltaLink and Enterprise Facility Proposals will be filed shortly.<sup>20</sup> The AESO requests, and expects AltaLink and Enterprise will request, that this Application be combined with the Facility Proposals for consideration by the Commission in a single process. This request is consistent with Section 15.4 of the *Hydro and Electric Energy Act* and Section 6 of AUC Rule 007.

3.2 While it is believed that this Application and the Facility Proposals will be materially consistent, the AESO respectfully requests that in its consideration of each, the Commission be mindful of the fact that the documents have been prepared separately and for different purposes. The purpose of this Application is to obtain approval of the need to respond to Enterprise's request for system access service and provide a preliminary description of the manner proposed to meet that need, having regard for the AESO's determination that the Proposed Transmission Development is required to provide Enterprise with a reasonable opportunity to exchange electric energy and ancillary services. In contrast, the Facility Proposals will contain more detailed engineering and designs for the Proposed Transmission Development and seek approval for the construction and operation of specific facilities.

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<sup>20</sup> The AESO understands that AltaLink intends to file a Facility Proposal relating to this Application to be titled *Enterprise Solar Connection Project*. The AESO understands that Enterprise intends to file a Facility Proposal relating to this Application to be titled *Enterprise Solar Interconnection and Transmission Line Application*.

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**4 Relief Requested**

4.1 The AESO submits that its assessment of the need to meet Enterprise’s request for system access service is technically complete and that approval is in the public interest.

4.2 For the reasons set out herein, and pursuant to Section 34 of the Act, the AESO requests that the Commission approve this Application, including issuing an approval of the need to respond to Enterprise’s request for system access service, and to connect the Facility to the transmission system, by means of the following transmission development:

- A. Add one 138 kV circuit to connect the Facility to the existing 138 kV transmission line 161L using a T-tap configuration;
- B. Modify, alter, add or remove equipment, including switchgear, and any operational, protection, control and telecommunication devices required to undertake the work as planned and ensure proper integration with the transmission system.

All of which is respectfully submitted this 20<sup>th</sup> day of August, 2021.

Alberta Electric System Operator

*“Electronically Submitted by”*

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Robert Davidson, P.Eng.  
Director, Customer Grid Access

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**PART B – APPLICATION APPENDICES**

The following appended documents support the Application (Part A).

**APPENDIX A**      **Connection Assessment** – Appendix A contains the *AESO Engineering Connection Assessment – P2300 Enterprise Solar Project Connection* that assesses the transmission system performance prior to and following the connection of the Proposed Transmission Development. As part of the AESO Connection Process, the AESO defined the study scope, and provided the system models and study assumptions to Enterprise who engaged a consultant to conduct the connection assessment studies. The AESO reviewed the results of the connection assessment studies prepared by the consultant, and finds the results of the connection assessment acceptable for the purposes of assessing the impacts of the Proposed Transmission Development on the transmission system.

**APPENDIX B**      **Capital Cost Estimates** – Appendix B contains detailed cost estimates corresponding to the Proposed Transmission Development. These estimates have been prepared by AltaLink and Enterprise. The cost estimates have an accuracy level which exceeds the accuracy required by AUC Rule 007, NID24.

**APPENDIX C**      **AESO PIP** – Appendix C contains a summary of the PIP activities conducted, in accordance with requirements of NID27 and Appendix A2 of AUC Rule 007, regarding the need to respond to Enterprise’s request for system access service. Copies of the relevant materials distributed during the PIP are attached for reference.

**APPENDIX D**      **Information Regarding AUC Rule 007, Section 6.2.2, NID23(3) and NID25(2)** – Appendix D contains letters provided by AltaLink and Enterprise confirming that the requirements of AUC Rule 007, NID23(3) and NID25(2) will be addressed within their respective Facility Proposals.



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## PART C – REFERENCES

- i. **AESO Planning Duties and Responsibilities** – Certain aspects of the AESO’s duties and responsibilities with respect to planning the transmission system are described in the Act. For example, Section 17, Subsections (g), (h), (i), and (j), describe the general planning duties of the AESO.<sup>21</sup> Section 33 of the Act states that the AESO “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.” Where, as in this case, Enterprise (refer to note ii below) is requesting system access service, and the AESO has determined that the request requires or may require the expansion or enhancement of the capability of the transmission system, the AESO must prepare and submit for Commission approval, as per Section 34(1)(c), a needs identification document that describes the need to respond to requests for system access service, including the assessments undertaken by the AESO regarding the manner proposed to address that need. Other aspects of the AESO’s transmission planning duties and responsibilities are set out in Sections 8, 10, 11, and 15 of the *Transmission Regulation*.
- ii. **Duty to Provide Transmission System Access** – Section 29 of the Act states that the AESO “must provide system access service on the transmission system in a manner that gives all market participants [Enterprise Solar GP Inc., on behalf of Enterprise Solar LP, owned by Renewable Energy Systems Canada Inc. in this case] wishing to exchange electric energy and ancillary services a reasonable opportunity to do so.”
- iii. **AESO Planning Criteria** – In accordance with the Act, the AESO is required to plan a transmission system that satisfies applicable reliability standards. Transmission Planning (TPL) standards are included in the Alberta Reliability Standards, and are generally described on the AESO website.  
  
In addition, the AESO’s *Transmission Planning Criteria – Basis and Assumptions* is included in Appendix A.
- iv. **AESO Connection Process** – For information purposes, the AESO Connection Process, which changes from time to time, is generally described on the AESO website.
- v. **Application for Approval of the Need to Respond to a Request for System Access Service** – This Application is directed solely to the question of the need to respond to a request

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<sup>21</sup> The legislation and regulations refer to the Independent System Operator or ISO. "AESO" and "Alberta Electric System Operator" are the registered trade names of the Independent System Operator.

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for system access service, as more fully described in the Act and the *Transmission Regulation* and the AESO's determination of the manner in which to respond to the request. This Application does not seek approval of those aspects of transmission development that are managed and executed separately from the needs identification document approval process. Other aspects of the AESO's responsibilities regarding transmission development are managed under the appropriate processes, including the ISO rules, Alberta reliability standards and the ISO tariff, which are also subject to specific regulatory approvals. While the Application or its supporting appendices may refer to other processes or information from time to time, the inclusion of this information is for context and reference only.

Any reference within the Application to market participants or other parties and/or the facilities they may own and operate or may wish to own and operate, does not constitute an application for approval of such facilities. The responsibility for seeking such regulatory or other approval remains the responsibility of the market participants or other parties.

- vi. **Directions to the TFO** – Pursuant to Subsection 35(1) of the Act, the AESO has directed AltaLink, in its capacity as a legal owner of transmission facilities, in whose service territories the need is located, to prepare a Facility Proposal to meet the need identified. The Facility Proposal is also submitted to the Commission for approval. The AESO has also directed AltaLink, pursuant to Section 39 of the Act and Section 14 of the *Transmission Regulation*, to assist in the preparation of the AESO's Application. AltaLink has also been directed by the AESO under Section 39 of the Act to prepare a service proposal to address the need for the Proposed Transmission Development.
- vii. **Capital Cost Estimates** – The provision of capital costs estimates in the Application is for the purposes of relative comparison and context only. The requirements applicable to cost estimates that are used for transmission system planning purposes are set out in Section 25 of the *Transmission Regulation*, AUC Rule 007, and Section 504.5 of the ISO rules, *Service Proposals and Cost Estimating*.