

## Compliance Quarterly Report Q2 2020

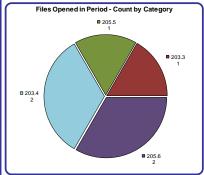
SO Rules	1
SO Rules 9.1 and 501.2	2
Load Settlement	
Alberta Reliability Standards	
Terminology	

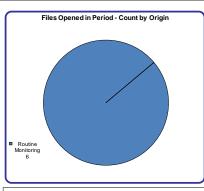
## **Alberta Electric System Operator**

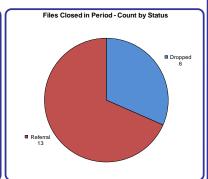


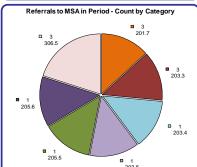
## Compliance Quarterly Report - ISO Rules - Q2 2020

The following charts summarize the activities of the ISO Rules External Compliance Monitoring group in Q2 of 2020 and the distribution of events over the past 4 quarters. Please refer to the attached help documentation for details on interpreting the charts below. For any questions regarding this report, please send an email to isorulescompliance@aeso.ca.







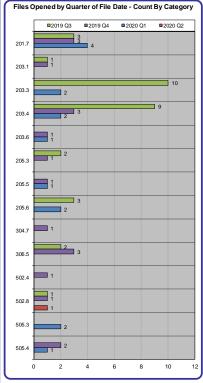


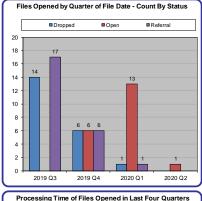
### Commentary

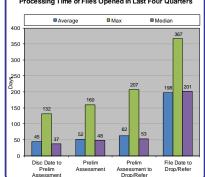
There were 6 files opened during Q2 2020 and 19 files closed. Of the 19 files closed in the quarter, there were 13 referrals to the MSA of suspected contraventions. These referrals are distributed across 7 ISO rules.

The 24 referrals to the MSA for events occurring in the past 4 quarters (by quarter of file date) are distributed across 14 pool participants and 8 ISO rules. Processing times are up from the last quarterly report with a median of 201 days between the occurrence of the event and closure of the handling of the event.

Note: As the AESO may refer multiple events in a single referral to the MSA, the AESO's count of referrals to the MSA may not match the MSA's count of AESO referrals, nor the count of penalties issued by the MSA in any given period from AESO referrals.







## Referrals to MSA by Quarter of File Date and Masked ID

D 22.1	0010.00	0010.01	0000 04	0000 00
Participant	2019 Q3	2019 Q4	2020 Q1	2020 Q2
P1	1			
P2		1		
P3	1			
P4		1		
P5	1			
P6	3			
P7	2			
P8	2			
P9	1			
P10	1			
P11		1		
P12	1			
P13	3	3	1	
P14	1			

## Referral to MSA by Quarter of File Date and Category

Category	2019 Q3	2019 Q4	2020 Q1	2020 Q2
201.7	3	2		
203.3	6		1	
203.4	2			
203.6		1		
205.3	2			
205.5		1		
205.6	2			
306.5	2	2		

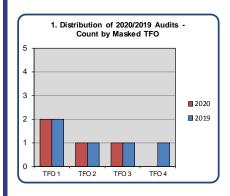
Page 1 Public

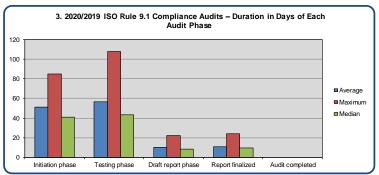


## Compliance Quarterly Report - Sections 9.1 and 501.2 of the ISO Rules - Q2 2020

The following charts summarize the status of the activities of the ISO Rules External Compliance Monitoring group in relation to Sections 9.1 and 501.2 of the ISO Rules as of Q2 2020. For any questions regarding this report, please send an email to tpcompliance@aeso.ca (for Section 9.1) or securityrulecompliance@aeso.ca (for Section 501.2).

## Section 9.1 of the ISO Rules





# 2. 2020/2019 ISO Rule 9.1 Event Outcomes - Count by Category No. of events where no contraventions identified No. of events where 1 or more suspected contraventions identified

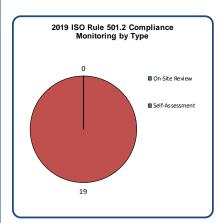
## Commentary

The remaining 2019 audit has been completed which resulted in a referral to the MSA for a suspected contravention. There are four full audits planned for 2020. One of those audits has been completed. The distribution of audits across legal owners of transmission facilities ("TFO") is presented in Graph 1.

There are no other (non-audit) 9.1 events requiring investigation by the External Compliance Monitoring group as of Q2 2020.

Graph 3 serves as an indication of the time it has taken to complete the various phases of each completed audit in 2019 and 2020.

## Section 501.2 of the ISO Rules



## Commentary

In 2019, the the AESO initiated self-assessments for all selected sites designated as Critical Facilities by the Government of Alberta's Security and Strategic Intelligence Support Team.

All of the self-assessments have been reviewed and closed. The final assessment was closed June 19, 2020. No referrals have been made to the Market Surveillance Administrator resulting from the completed compliance monitoring of Section 501.2 for the period of 2017 to the publication date of this report.

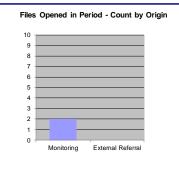
Note: the Alberta Utilities Commission has approved Alberta Reliability Standard CIP-014-AB-2, Physical Security, with an effective date of July 1, 2020, and Section 501.2 will be removed concurrently. As such future quarterly compliance reports will no long report upon activities associated with Section 501.2.

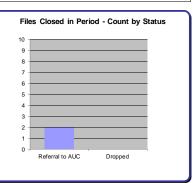


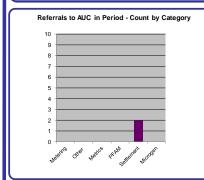
## Compliance Quarterly Report - Load Settlement - Q2 2020

The following charts summarize the activities of the Load Settlement Compliance Monitoring group over the four quarters ending June 2020. Please refer to the attached help documentation for details on interpreting the charts below. For any questions regarding this report, please send an email to loadsettlementcompliance@aeso.ca.

## Files Opened in Period - Count by Category

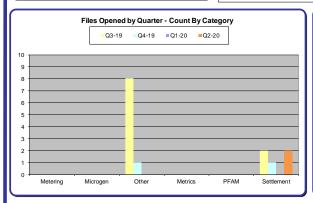


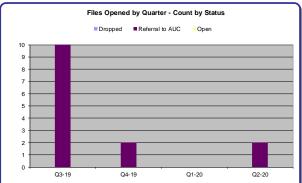




## Commentary

There were two new files opened in Q2 2020 both relating to Settlement.





Referrals to AUC by Quarter of Referral Date and Masked Participant ID				
Participant	Q3-19	Q4-19	Q1-20	Q2-20
LS1	1			
LS2	1	1		
LS3	1			
LS4	1			2
LS5	1	1		
LS6	1			
LS7	1			
LS8	1			
LS9	1			
LS10	1			
LS11				
LS12				
LS13				

Referrals to AUC by Quarter of Referral Date and Category				
Category	Q3-19	Q4-19	Q1-20	Q2-20
Metering				
Microgen				
Other	8	1		
Metrics				
PFAM	2	1		
Settlement				2





Page 4 Public



	Common Terminology		Table Specific Terminology
Category	Each Compliance File has an associated Category which refers to the ISO rule, AUC Rule 021 topic or Reliability Standard which may have been contravened. In the case of multiple categories, a principle category is assigned to the File.	Origin	A Compliance File has an origin which is an indication of how the Flagged Event was identified eg. Monitoring, SC Referral, OC Referral, etc.
Clarification Request	An email request sent in the ISO Rules Compliance process seeking additional detail on the information submitted with an offer restatement. This is part of the ISO Rules <b>Monitoring</b> process.	CR	A File Origin of CR indicates that the event resulted from a Clarification Request.
Compliance File	A compliance file refers to one or more Flagged Events that have been logged for Preliminary Assessment, or where a suspected contravention has been identified through a Compliance Monitoring Audit in accordance with ISO Rule 103.12. Every Compliance File has a status of Open, Dropped or Referred. Each Compliance File is applicable to a single market participant and has an associated File Date and Category.	External Referral	A <b>File Origin</b> of External Referral is a possible ISO rule, AUC 021 topic or Reliability Standard contravention identified by individuals outside the AESO and referred to compliance for a more detailed examination.
Compliance Monitoring Audit	As described in ISO Rule 103.12. The process of monitoring or review of a TFO's compliance with ISO Rule 9.1.5.	Internal Referral	A File Origin of Internal Referral is a possible ISO rule, AUC 021 topic or Reliability Standard contravention identified by other (non-compliance) personnel in the AESO in the course of their own work and referred to compliance for a more detailed examination.
Compliance Monitoring Audit Report	A report described in ISO Rule 103.12.9 (4) which communicates the results of the Compliance Monitoring Audit to the TFO and provides support for any referral to the MSA.	Other	A File Origin of type Other refers to events which Compliance examined but which were brought to our attention through untypical means such as a question from a market participant or an AESO IT problem report.
Date of Discovery	For an internal or external referral, the date that the referral was received.  For an event identified by <b>Monitoring</b> , the date on which the AESO discovers the event and logs it for <b>Preliminary Assessment</b> .	Status	The current state of a Compliance File. Either Open File, Dropped File or Referred File.
Date of Notification	The date that a TFO is notified of a Compliance Monitoring Audit of its transmission facility project and a request for information that facilitate commencement of the Compliance Monitoring Audit.	Dropped File	The status of a Compliance File which is closed but is not a Referred File. A File may be closed for a variety of different reasons including: unreliable data, AESO IT system problems, Mitigating Factors as defined in ISO Rule 103.12 or an assessment that no rule has been contravened. A dropped file may have
File	Synonym for Compliance File.		resulted in a Warning Letter being sent.
File Date	A unique date associated with a <b>Compliance File</b> . In the case of ISO rules compliance, this is the date of the <b>event</b> itself. In the case of AUC 021 monitoring, this is the <b>Date of Discovery</b> .	Open File	The <b>status</b> of a <b>Compliance File</b> which has been opened but which has not yet been <b>Dropped</b> or <b>Referred</b> to the MSA/AUC.
Files Closed in Period	Compliance Files whose <b>status</b> changed to either <b>Dropped File</b> or <b>Referred File</b> within the reporting period. Note that these may have file dates from earlier quarters.	Referred File	The status of a Compliance File for which a referral regarding the file has been made to the AUC/MSA in accordance with ISO Rule 103.12.
Files Opened in Period	Compliance Files with a <b>Date of Discovery</b> falling within the reporting period.		
Flagged Event	A collection of one or more submissions or actions carried out by a market participant that may form the basis of a compliance file. Flagged events can come from Monitoring, an Internal Referral or an External Referral or from Clarification Requests.	Processing Time of Files Opened in the Last Four Quarters	An indication of the number of days taken to move a <b>Compliance File</b> through the various stages of the Compliance Process.
Information Request	As described in ISO Rule 103.12, an Information Request is a letter submitted to a market participant describing the particulars of a potential ISO rule, AUC 021 topic or Reliability Standard contravention and seeking the market participant's input on the event.	Disc. Date to Prelim. Assess	The number of days between the <b>Date of Discovery</b> for a <b>Compliance File</b> and the commencement of the <b>Preliminary Assessment</b> .
Masked Participant ID	A unique identifier associated with each market participant for tracking Referred Files for that participant but without revealing the particular participant. The Masked Participant ID will NOT be consistent from report to report.	Prelim. Assess.	The number of days between the commencement of the <b>Preliminary Assessment</b> and its completion.
Masked Transmission Facility Owner (TFO)	A unique identifier associated with each <b>TFO</b> for tracking Compliance Monitoring Audits for that participant but without revealing the <b>TFO</b> name. The Masked <b>TFO</b> ID will NOT be consistent from report to report.	Prelim. Assess. To Drop/Refer	The number of days between the completion of a <b>Preliminary Assessment</b> and the decision to drop or refer the file to the MSA/AUC. This is only relevant for events where an <b>Information Request</b> was sent.
Monitoring	Queries, reports and other tools run by Compliance on a regular basis to identify Flagged Events.	File Date to Drop/Refer	The number of days between the File Date and the change in status for the Compliance File to either Dropped File or Referred File.
Other	A Category of Other applies to events which Compliance examined but did not prove to be associated with any potential rule contravention.		
Other Events	Compliance monitoring activities, other than Compliance Monitoring Audit, in relation to ISO Rule 9.1.1 <i>Monthly Reporting</i> , ISO Rule 9.1.3.4 <i>Project Change Proposal</i> , and ISO Rule 9.1.3.6 <i>Final Cost Report</i> .	Duration of ISO Rule 9.1 Compliance Audits	An indication of the number of weeks taken to move a Compliance Monitoring Audit through the various stages of the audit process.
Preliminary	As described in ISO Rule 103.12. The process of carrying out a detailed examination of a potential ISO rule, AUC 021 topic or Reliability Standard contravention (which is separate from a Compliance Monitoring Audit). This starts with the opening of a Compliance File and culminates in a decision to:	Initiated  Testing phase	The number of weeks between the <b>Date of Notification</b> and the date that the AESO received the <b>TFO Records</b> .
Assessment	send an Information Request regarding the event to the relevant market participant; to conclude that the data does not support an assessment of non- compliance and to drop the event; or, potentially, to make a referral to the AUC or MSA.		The number of weeks between the receipt of the <b>TFO Records</b> and the date that the AESO provided a Draft <b>Compliance Monitoring Audit Report</b> to the TFO for review and comments.
Referrals in Period	Compliance Files which have been referred to the MSA/AUC (as appropriate) in the period. Note that these may have file dates from previous quarters.	Draft report phase	The number of weeks between the end of the Testing Phase and the receipt of TFO comments on the draft <b>Compliance Monitoring Audit Report</b> .
TFO Records	Documents, correspondences and other records of information that support compliance with ISO Rule 9.1.5	Report finalized	The number of weeks between the receipt of the Draft Compliance Monitoring Audit Report with TFO comments and the Compliance Monitoring Audit Report is finalized.
Warning Letter	In certain cases where a Preliminary Assessment has not been carried out or does not support an assessment of non-compliance, a letter may be sent to one or more participants which clarifies the obligations of a particular rule.	Audit completed	The number of weeks between the date of finalizing the <b>Compliance</b> Monitoring Audit Report and the date of referral to the MSA or closing the audit, in case of non-referral.

Page 5 Public