Stakeholder Comment Matrix
Additional Feedback for New Section 502.10, *Revenue Metering Technical Requirements*

Period of Comment:	May 21, 2020	through	June 26, 2020	**Contact:**	Darren Hoeving
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Date:	2020/06/26			**Email**:	

The AESO is seeking additional comments from Stakeholders on the following topics for the proposed New Section 502.10 of the ISO rules, *Revenue Metering Technical Requirements* ("Section 502.10"):

	Question	Stakeholder Comments and/or Alternate Proposal
1. "revenue meter" Definition	Further to the comments raised during the December 11, 2019 stakeholder session, as detailed in the meeting minutes posted on the AESO website, please indicate any additional concerns regarding the proposed defined term and definition "revenue meter" and provide suggested wording revisions including any physical components that should be included in the definition. "**revenue meter**" means the apparatus that measures active energy or reactive energy at intervals defined by the **ISO** for the purpose of financial settlement with the **ISO**.	Background: The *Electricity and Gas Inspection Act and Electricity and Gas Inspection Regulation* considers an installation a "revenue meter". It is either one discrete device (self-contained) or may include ancillary devices such as Current Transformers (CT's) and Power Transformers (PT's) (instrument service); the entire installation is considered a revenue meter. As all new meters have interval capability, the AESO should clarify in the definition that the rule is intended to apply to interval meters used to generate interval data for financial settlement process and not cumulative meters with interval capability. Recommendation: "revenue meter" means the meter and ancillary devices (CT's & PT's) required to measure active energy or reactive energy at intervals defined by the ISO for the purpose of financial settlement with the ISO, and does not apply to cumulative meters with interval capability.
2. "revenue metering system" Definition	Please identify the components that should be included in the definition of "revenue metering system" beyond the components identified above for "revenue meter". Additionally, for each component indicated to be part of the "revenue metering system" please note the requirement in proposed new Section 502.10 that makes the component necessary. "**revenue metering system**" means the **metering equipment**, including the **revenue meter**, for acquisition, processing, delivery and storage of the interval data that is used for financial settlement with the **ISO**.	FortisAlberta recommends the definition be simplified and reference applicable sections of the proposed rule as follows: "**revenue metering system**" means revenue meter, data acquisition and data validation and storage, at intervals that are used for financial settlement with the ISO. The definition could also include references to the following applicable sections of the proposed rule: Revenue Meter = Sections 5, 6 Data acquisition = Section 4 Data validation = Sections 7, 8, 9, 10 Date Storage = Section 7

3. Rental Meters	a) Please describe the circumstances under which your business would choose to install rental meters.	None, as per the *Electricity and Gas Inspection Act* and *Electricity and Gas Inspection Regulation* all meters are registered under a contract registration number and assigned to one seller of electricity. Guidance for the "sale" of meters is provided by Measurement Canada. Guidance from Measurement Canada would be required to determine a process for "rental" of meters.
	b) Additionally, would any exceptions to the minimum technical requirements need to be considered in the proposed Section 502.10? If so, please detail and explain the impacts.	Guidance from Measurement Canada would be required to determine a process for rental of meters.
4. Back-up Meters	a) Please describe the circumstances under which your business would choose to install a back-up meter.	None that FortisAlberta is currently aware of.
	b) Does your organization support the addition of requirements pertaining to backup meter installation in the proposed draft Section 502.10? If so, detail the criteria needed.	No, FortisAlberta has mature processes including validation systems with no evidence of a problem with current practices and in those cases where actual data is not available the marketplace has mature processes for use of estimates until actual data is made available.
	c) Additionally, please provide the estimated installation and operating costs for a back-up meter as well as annual maintenance costs, if any.	To develop an estimate of costs FortisAlberta would first need to understand the extent of the request, regarding volume and size of installations impacted. In many situations this would require site visits as the meter, ancillary devices, and connections may be impacted.
5. Shared Current Transformers	a) Please indicate whether your organization has installed meters that share CTs. If so, how many and under what conditions?	Yes, FortisAlberta has one installation out of 559,895 installed meters that shares a CT to allow the customer to monitor/control its load at a remote location.
	b) Have you experienced any issues with the meters that share CTs, such as increased meter measurement error?	None that FortisAlberta is aware of.
	c) Does your organization think the proposed Section 502.10 should incorporate requirements regarding the sharing of CTs?	No

6. MW Class Determination	a) How is MW class currently being calculated for in-situ testing.	As defined in the Measurement Point Definition Record (MPDR).
	b) Please provide your organizations view on the following: i. Should Section 502.10 set out a standard timeframe to be used for the data set used in the calculation of MW class. For instance, should the AESO adopt a November to November timeframe. Or does the month to month period selected not impact the data set; ii. If a standard timeframe is included in proposed Section 502.10 that does not align with your organizations current practices and systems please provide an estimate of the cost implications; iii. Should 0 MW intervals be factored into the methodology when determining MW class; iv. Should there be notification requirements for when a measurement point for a unit crosses the MW class threshold. Additionally, when should the first in-situ test be performed once the MW class changes; v. Does your organization support the 2 and 4 year testing frequency requirements based on MW class; and vi. Should a metering point with a higher impact on the grid when it is operational be tested more frequently or should it be based on the average throughout the year?	i through iv: The thresholds, applicable to new or modified MPDRs for testing purposes will be set as defined in the MPDR. Visibility of the current demand values is already provided to the AESO through existing market transactions under Rule 021. v. through vi: FortisAlberta supports an average MW Range of >= 5MW and <=20MW with a testing interval of 4 years and 2 years for >20MW. Less than 5MW would be at the discretion of the legal owner of the revenue meter.

7. In-situ Testing	In performing in-situ testing at the commissioning stage, what should the "reasonable methods" be? Should the AESO be more prescriptive?	No, the process should be determined by the legal owner of the revenue meter, at agreed to frequency with the AESO. Owner has an obligation to maintain records that could be made available for audit.
8. Measurement data errors	In subsection 9 of proposed new Section 502.10, should the AESO set a threshold for the measurement data error?	No, the AESO should continue to align with statutory limits stated in the *Electricity Gas Inspection Act and Electricity Gas Inspection Regulation*, set at +/- 3%. Anything less than 3% would be impractical for variable loads.
9. Do you have any other comments regarding the proposed new Section 502.10?		None.