Comments From: FortisAlberta Phone: 403-988-4336 Date: 2020/06/26 Email:	Period of Comment:	May 21, 2020	through	June 26, 2020	Contact:	Darren Hoeving
Date: 2020/06/26 Email :	Comments From:	FortisAlberta			Phone:	403-988-4336
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The AESO is seeking comments from Stakeholders regarding the applicability for the requirements contained in proposed New Section 502.10 of the ISO rules, *Revenue Metering Technical Requirements* ("Section 502.10").

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Question	Stakeholder Comments
Please indicate, from the perspective of your business:	
 the party responsible for performing the work detailed in each requirement below; and 	
(ii) the party that should be ultimately responsible for meeting the requirements below.	
Further, in subsection 4(3) below, please note the AESO's additional request to provide information regarding the party to which the AESO should issue the measurement point definition record.	
Measurement Point Definition Record	
4(1) The legal owner of a revenue meter must, where such legal owner requires a new measurement point definition record or an amendment to an existing measurement point definition record ,	Responsibility and performance are with the legal owner as defined in the AESO's <i>Consolidated Authoritative Document Glossary</i> . Given the stage of the engagement, FortisAlberta notes that its comments may be
apply to the ISO no later than 30 days prior to the first day of the month in which the legal owner of the revenue meter proposes to energize the new or altered revenue metering system for the first time.	subject to change as the proposed rule becomes more fully developed.
(2) The legal owner of a revenue meter must submit to the ISO the information prescribed by the ISO when applying for a new or	Responsibility and performance are with the legal owner as defined in the AESO's Consolidated Authoritative Document Glossary.
amended measurement point definition record in accordance within subsection 4(1).	Given the stage of the engagement, FortisAlberta notes that its comments may be subject to change as the proposed rule becomes more fully developed.
Please provide information regarding the party to which the AESO should issue the measurement point definition record.	The AESO should issue the measurement point definition record to the designated MDM accountable for providing the data to the AESO.
(3) The ISO must issue a measurement point definition record for a measurement point to the legal owner of the revenue meter, or to a person designated by the legal owner of the revenue meter, if the information submitted in accordance with subsection 4(2):	

(4) The legal owner of a revenue meter must install and operate a revenue meter in accordance with measurement point definition record issued by the ISO in accordance with subsection 4(3)	Responsibility and performance are with the legal owner as defined in the AESO's <i>Consolidated Authoritative Document Glossary</i> . Given the stage of the engagement, FortisAlberta notes that its comments may be subject to change as the proposed rule becomes more fully developed.
Revenue Meter	
5(1) The legal owner of a revenue meter must ensure that the revenue meter is approved, verified, sealed, re-verified and sealed, as applicable, in accordance with the <i>Electricity and Gas Inspections Act</i> , RSC 1985 c E-4, as amended.	Responsibility and performance are with the legal owner as defined in the AESO's <i>Consolidated Authoritative Document Glossary</i> . Given the stage of the engagement, FortisAlberta notes that its comments may be subject to change as the proposed rule becomes more fully developed.
 (2) The legal owner of a revenue meter must ensure that the revenue meter has an accuracy class rating that is less than or equal to 0.2% for Watthour measurement if: (a) the capacity of the metering point of the revenue meter is greater than or equal to 1.0 MVA; and (b) the revenue meter is not the subject of a dispensation under the <i>Electricity and Gas Inspection Act</i>, RSC 1985 c E-4, as amended. 	Responsibility and performance are with the legal owner as defined in the AESO's <i>Consolidated Authoritative Document Glossary</i> . Given the stage of the engagement, FortisAlberta notes that its comments may be subject to change as the proposed rule becomes more fully developed.
 (3) The legal owner of a revenue meter must ensure that the revenue meter has an accuracy class rating that is less than or equal to 0.5% for Varhour measurement if: (a) the capacity of the metering point of the revenue meter is greater than or equal to 1.0 MVA; and (b) the revenue meter is not the subject of a dispensation under the <i>Electricity and Gas Inspection Act</i>, RSC 1985 c E-4, as amended. 	Responsibility and performance are with the legal owner as defined in the AESO's <i>Consolidated Authoritative Document Glossary</i> . Given the stage of the engagement, FortisAlberta notes that its comments may be subject to change as the proposed rule becomes more fully developed.

 6(1) The legal owner of a revenue meter must ensure that the measurement transformer has an accuracy class rating less than or equal to 0.3% if: (a) the capacity of the metering point of the revenue meter is greater than or equal to 1.0 MVA; and (b) the revenue meter is not the subject of a dispensation under the <i>Electricity and Gas Inspection Act</i>, RSC 1985 c E-4, as amended. 	Responsibility and performance are with the legal owner as defined in the AESO's <i>Consolidated Authoritative Document Glossary.</i> Given the stage of the engagement, FortisAlberta notes that its comments may be subject to change as the proposed rule becomes more fully developed.
 (2) The legal owner of a revenue meter must, unless the ISO approves otherwise, ensure that the measurement transformer: (a) is located and connected without compensation methods; (b) produces a real metering point; and (c) has a dedicated current transformer core for measurement. 	Responsibility and performance are with the legal owner as defined in the AESO's <i>Consolidated Authoritative Document Glossary</i> . Given the stage of the engagement, FortisAlberta notes that its comments may be subject to change as the proposed rule becomes more fully developed.
Metering Data Services	
7(1) The legal owner of a revenue meter must retain metering data from the revenue metering system , including a record of final estimates and adjustments and the method used to perform the estimates or adjustments, in the electronic format specified in the Commission's <i>Rule 021: Settlement System Code Rules</i> for a period of at least 8 years.	Responsibility and performance are with the legal owner as defined in the AESO's <i>Consolidated Authoritative Document Glossary</i> . Given the stage of the engagement, FortisAlberta notes that its comments may be subject to change as the proposed rule becomes more fully developed.
(2) The legal owner of a revenue meter must process metering data for each measurement point in accordance with the algorithm in the measurement point definition record issued in accordance with subsection 4(3).	Responsibility and performance are with the legal owner as defined in the AESO's <i>Consolidated Authoritative Document Glossary.</i> Given the stage of the engagement, FortisAlberta notes that its comments may be subject to change as the proposed rule becomes more fully developed.



(3) The legal owner of a revenue meter must, within 30 days of energizing the revenue meter for the first time, validate the metering equipment and the metering data using reasonable methods and alternative data sources.	Responsibility and performance are with the legal owner as defined in the AESO's <i>Consolidated Authoritative Document Glossary</i> . Given the stage of the engagement, FortisAlberta notes that its comments may be subject to change as the proposed rule becomes more fully developed.		
Revenue Meter Testing and Reporting			
8(2) The legal owner of a revenue meter must provide the results of the in-situ test performed in subsection 8(1) to ISO if the test	Responsibility and performance are with the legal owner as defined in the AESO's Consolidated Authoritative Document Glossary.		
resulted in an error measurement of +/- 3%.	Given the stage of the engagement, FortisAlberta notes that its comments may be subject to change as the proposed rule becomes more fully developed.		
(3) The legal owner of a revenue meter must, at the request of the ISO:	Responsibility and performance are with the legal owner as defined in the AESO's Consolidated Authoritative Document Glossary.		
(a) undertake and complete in-situ tests for the metering equipment within a mutually agreed time frame; and	Given the stage of the engagement, FortisAlberta notes that its comments may be subject to change as the proposed rule becomes more fully developed.		
(b) report the results to the ISO within 30 days of receiving the ISO's request.			
Measurement Data Corrections			
9(1) The legal owner of a revenue meter must, if the legal owner discovers an error in measurement data that has been submitted to the ISO for financial settlement, notify the ISO of the error as soon as practicable in the form the ISO specifies.	Responsibility and performance are with the legal owner as defined in the AESO's <i>Consolidated Authoritative Document Glossary</i> . Given the stage of the engagement, FortisAlberta notes that its comments may be subject to change as the proposed rule becomes more fully developed.		

 (2) The legal owner of a revenue meter must include the following information in the notice referred to in subsection 9(1): (a) the reason for the error; and (b) the correct measurement data. 	Responsibility and performance are with the legal owner as defined in the AESO's <i>Consolidated Authoritative Document Glossary.</i> Given the stage of the engagement, FortisAlberta notes that its comments may be subject to change as the proposed rule becomes more fully developed.
(4) The legal owner of a revenue meter must submit the correct measurement data to the ISO as soon as practicable if the ISO's review in subsection 9(3) confirms that the previously submitted measurement data was erroneous.	Responsibility and performance are with the legal owner as defined in the AESO's <i>Consolidated Authoritative Document Glossary</i> . Given the stage of the engagement, FortisAlberta notes that its comments may be subject to change as the proposed rule becomes more fully developed.
Restoration	
10(1) The legal owner of a revenue meter must, upon becoming aware of a failure of the revenue metering system that may result in a restatement of measurement data that has been submitted to the ISO , notify the ISO in writing of the failure.	Responsibility and performance are with the legal owner as defined in the AESO's <i>Consolidated Authoritative Document Glossary</i> . Given the stage of the engagement, FortisAlberta notes that its comments may be subject to change as the proposed rule becomes more fully developed.
(2) The legal owner of a revenue meter must, within 30 days of providing the notification under subsection 10(1):	Responsibility and performance are with the legal owner as defined in the AESO's Consolidated Authoritative Document Glossary.
(a) investigate and determine the nature and extent of the failure;	Given the stage of the engagement, FortisAlberta notes that its comments may be subject to change as the proposed rule becomes more fully developed.
(b) provide the ISO with written notification detailing the nature and extent of the failure; and	
(c) submit to the ISO a plan to restore the revenue metering system .	



(3) The ISO must:	The AESO should direct the MDM accountable for providing the data to the AESO.
(a) […] ; or	
(b) direct the legal owner of the revenue meter to amend the restoration plan in a manner that will resolve the failure within a reasonable amount of time.	
(4) The legal owner of a revenue meter must amend the restoration plan in accordance with the ISO's direction provided in	Responsibility and performance are with the legal owner as defined in the AESO's Consolidated Authoritative Document Glossary.
subsection 10(3)(b).	Given the stage of the engagement, FortisAlberta notes that its comments may be subject to change as the proposed rule becomes more fully developed.
(5) The legal owner of a revenue meter must restore the revenue metering system in accordance with:	Responsibility and performance are with the legal owner as defined in the AESO's <i>Consolidated Authoritative Document Glossary</i> .
(a) the restoration plan approved by the ISO pursuant to subsection 10(3)(a); or	Given the stage of the engagement, FortisAlberta notes that its comments may be subject to change as the proposed rule becomes more fully developed.
(b) the restoration plan amended in accordance with subsection 10(4).	