

December 14, 2012

Don Popowich  
Director, Facilities  
Alberta Utilities Commission  
Fifth Avenue Place  
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Calgary, Alberta T2P 3L8

Dear Mr. Popowich:

**Re: Goose Lake to Chapel Rock Amendment to the Alberta Utilities Commission (Commission) Southern Alberta Transmission System Reinforcement (SATR) Approval No. U2011-115 (SATR NID Approval)**

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1. Pursuant to the relevant provisions of the *Electric Utilities Act*, S.A. 2003, c. E-5.1 (EUA); the *Alberta Utilities Commission Act*, S.A. 2007, c. A-37.2 (AUCA); the Commission Rule 001 - *Rules of Practice*; and further to Commission *Decision 2011-468*; the Alberta Electric System Operator (AESO) is applying to the Commission for approval:
  - (a) of certain amendments to the SATR NID Approval in order to replace the Crowsnest substation and the double circuit 240 kV line connecting Goose Lake substation to the Crowsnest substation, and
  - (b) to withdraw Application No. 1607580,all as more particularly described below (Application).

#### **Organization of this Application**

2. This Application is organized in the following manner:
  - Withdrawal Application No. 1607580
  - Background – SATR NID Approval
  - Background – Other Developments Relating to this Application
    - Castle Rock Ridge Connection
    - Fidler 312S Substation
  - Existing SATR NID Approval Transmission Developments to be Amended

- Proposed Amendments
- Rationale for Proposed Amendments
  - Crowsnest Substation Amended to Chapel Rock 491S Substation
  - Reactive Power Requirements at Chapel Rock 491S Substation
  - Goose Lake to Chapel Rock 240 kV Line
- Recommended Alternative – Chapel Rock Connection
  - Chapel Rock Connection – Technical Considerations
  - Chapel Rock Connection – Economic Considerations
  - Chapel Rock Connection – Land Impact Assessment
  - Chapel Rock Connection – Participant Involvement Program
- The Need for Transmission Reinforcement Remains the Same as Identified in the SATR NID
- Request for Approval

### **Withdraw Application No. 1607580**

3. In the SATR needs identification document (SATR NID), the AESO recommended, and the Commission approved, a new 500/240 kV Crowsnest substation tapping the existing 1201L Langdon to Cranbrook 500 kV transmission line and the Goose Lake to Crowsnest 240 kV double circuit transmission line to provide a path for generation in southern Alberta.<sup>1</sup>
4. On August 10, 2011, by Application No. 1607580, the AESO filed an application to amend the SATR NID Approval to clarify that the site of the proposed 500/240 kV substation previously referred to as the “Crowsnest substation” is not restricted to either the Crowsnest area or the Crowsnest Pass area. By letter dated August 18, 2011, the AESO requested that the Commission establish a separate process to consider Application No. 1607580. The Commission has not yet made a decision in respect of the AESO’s Application No 1607580.<sup>2</sup>
5. This Application replaces Application No. 1607580 in its entirety. Accordingly, pursuant to section 21 of Commission Rule 001 - *Rules of Practice*, the AESO hereby provides notice of withdrawal of Application No. 1607580 and requests that the Commission approve such withdrawal.

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<sup>1</sup> SATR NID, section 7.1.6.

<sup>2</sup> *Decision 2011-468*, paragraph 20.

### **Background – SATR NID Approval**

6. On December 30, 2008, the AESO applied to the Commission for approval of a needs identification document for transmission reinforcement in southern Alberta (SATR NID). The Commission approved the SATR NID in *Decision 2009-126* and Approval No. U2009-340.
7. Pursuant to *Decision 2009-126*<sup>3</sup>, the AESO filed the finalized SATR milestones and monitoring process with the Commission on December 7, 2009. The Commission approved the finalized milestones and monitoring process in *Decision 2010-343* and Approval No. U2010-264. On October 5, 2010, the AESO reported that each of the SATR milestones had been met and that it had issued directions to the transmission facilities owner to prepare facility applications for SATR Stage 1 and Stage 2 components.<sup>4</sup>
8. On September 1, 2010, by Application No. 1606526, the AESO filed amendments to Approval No. U2010-264 and Approval No. U2010-435<sup>5</sup> in respect of the proposed Cassils 324S substation. On September 13, 2010, by Application No. 1606564, the AESO filed an amendment to Approval No. U2010-264 in respect of shunt reactors at the proposed 240 kV Sub D. The Commission approved Application Nos. 1606526 and 1606564 in *Decision 2011-102* and Approval No. U2011-115.
9. On May 11, 2012, by Application No. 1608442, the AESO filed an application to further amend the SATR NID Approval to delete certain Medicine Hat area upgrades for 600L and 880L transmission lines; the associated Proceeding ID No. 1879 is currently in progress.
10. On September 21, 2012, by Application No. 1608846, the AESO filed an application to further amend the SATR NID Approval to replace certain upgrades at the Peigan 59S substation with development of the Windy Flats 138S substation; the associated Proceeding ID No. 2001 is currently in progress.

### **Background - Other Developments Relating to this Application**

11. Several of the AESO's planned regional and connection transmission developments rely on the completion of various SATR components to connect to the transmission system. As further described below, developments that are specifically related to this Application include the Fidler 312S substation and the Castle Rock Ridge wind farm (CRR) connection.

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<sup>3</sup> Paragraph 116

<sup>4</sup> Southern Alberta Transmission Reinforcement (SATR) Milestones and Monitoring Process (MMP) – Status Report for Q3 2010; [http://www.aeso.ca/downloads/SATR\\_Milestones\\_Quarterly\\_Update\\_Q3\\_2010-R1.pdf](http://www.aeso.ca/downloads/SATR_Milestones_Quarterly_Update_Q3_2010-R1.pdf)

<sup>5</sup> Amendment to Hanna Region Transmission System Needs Identification Document, Application No. 1606434, Decision 2010-592.

## Castle Rock Ridge Connection

12. On June 16, 2010, by Application No. 1606281, the AESO applied to the Commission for approval of a needs identification document for the Castle Rock Ridge Wind Energy Connection (CRR NID).<sup>6</sup> The Commission approved the CRR NID in *Decision 2011-439* and Approval No. U2011-385 followed by its reasons for this decision in *Decision 2012-005* issued on January 10, 2012.
13. Connection of CRR to the transmission system relied on advancing the portion of the planned SATR double circuit 240 kV line from the Goose Lake 103S substation to "Point A" (shown on Figure 3, below).<sup>7</sup> CRR is now in operation and is connected to the Goose Lake 103S substation via the 240 kV double circuit 1071L/1072L transmission line. As further described in this Application, the proposed Fidler 312S substation is also planned to connect to Goose Lake 103S via the 240 kV double circuit 1071L/1072L transmission line.
14. In the CRR NID, the AESO described the \$25 million estimated cost of the proposed developments to be participant related.<sup>8</sup> The AESO's recommended Alternative 2 (via CRR) described hereunder will result in the AESO deeming substantially all of the participant related costs to be system related.<sup>9</sup>

## Fidler 312S Substation

15. On June 16, 2010, by Application No. 1606281, the AESO applied to the Commission for approval of a needs identification document for the proposed Fidler 312S 240/138 kV Substation (Original Fidler NID). The Commission established a hearing to determine certain Fidler preliminary issues and issued its Determination of Preliminary Issues *Decision 2011-468* on December 1, 2011.
16. As more fully described below, *Decision 2011-468* includes certain Commission findings that are relevant to this Application and in particular, that:

The second aspect is that the Goose Lake to Chapel Rock line is not the same as the Crowsnest to Goose Lake line. The AESO argued that the Goose Lake to Chapel Rock line should be considered the same as the Crowsnest to Goose Lake line approved in the SATR NID decision, despite the different physical location of the two lines. **Because there are material differences in the transmission facilities currently proposed from those approved in the SATR NID decision,**

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<sup>6</sup> As amended on August 4, 2011.

<sup>7</sup> CRR NID amendment letter, paragraph 15 and the AESO response to AUC-AESO-2, Proceeding ID No. 778.

<sup>8</sup> CRR NID, paragraph 2.3.

<sup>9</sup> The cost of the CRR developments are now estimated to be approximately \$27 million of which one motorized disconnect switch and related facilities are deemed to be participant related costs.

**both in terms of their geographic location and electric system configuration, the Commission finds that the Goose Lake to Chapel Rock line is not the same as the Goose Lake to Crowsnest line.** These differences in the transmission facilities now proposed by the AESO in the Fidler NID application require Commission approval under Section 34 of the Electric Utilities Act.<sup>10</sup> (Emphasis added)

17. In respect of the Original Fidler NID, the Commission also found that:

The Commission finds on the first preliminary issue that no NID approval exists for the Fidler interconnection; therefore the AESO must file a NID application for the transmission line from Fidler to its connection point along the proposed 240-kV double-circuit transmission line 1071L/1072L before further processing of the Fidler facility application can occur. Alternatively, the AESO may amend the SATR NID to reflect its ultimate plans to alleviate the constraints in the existing system and needs for improved efficiency of the transmission system in the Pincher Creek area.<sup>11</sup>

18. In response to the foregoing Commission findings, the AESO is filing this Application to amend the SATR NID Approval and, pursuant to the *Electric Utilities Act* s. 34(2), the AESO has also filed a separate needs identification document with the Commission for approval of the Fidler 312S Collector Substation connected to the existing 1071L transmission line (Fidler Collector NID).<sup>12</sup>

### **Existing SATR NID Approval Transmission Developments to be Amended**

19. The SATR NID Approval reflects a three-stage approach to the SATR. Specific development activities are described in the SATR NID Approval under each stage and Stage II includes the following three specific transmission developments:

#### ***SATR NID Approval, Stage II - Paragraphs 1, 3 and 4***

1. *“A new 500-kV Crowsnest substation to be located near Crowsnest Pass.”*
3. *“New SVCs at Crowsnest, “Sub C” and Cypress 562S substations.”*
4. *“A new 240-kV double-circuit transmission line connecting Crowsnest substation to Goose Lake 103S substation.”*

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<sup>10</sup> Decision 2011-468, paragraph 68

<sup>11</sup> Decision 2011-468, paragraph 123

<sup>12</sup> Application No. 1608960, Proceeding ID No. 2284

### **Proposed Amendments**

20. For the reasons provided below, the AESO proposes to amend the SATR NID Approval to delete paragraphs 1, 3 and 4 under Stage II and replace with:

1. *“A new 500/240 kV Chapel Rock 491S substation with one SVC, one shunt reactor and two shunt capacitors to be connected to the existing 500 kV 1201L in an in-out configuration.”*
3. *“New SVCs at “Sub C” and Cypress 562S substations.”*
4. *“A new 240-kV double-circuit transmission line connecting Chapel Rock 491S substation to Goose Lake 103S substation.”*

### **Rationale for Proposed Amendments**

21. In the SATR NID, the AESO recommended, and the Commission approved, a new 500/240 kV Crowsnest substation tapping the existing 1201L Langdon to Cranbrook 500 kV transmission line and the Goose Lake to Crowsnest 240 kV double circuit transmission line to provide a path for generation in southern Alberta.<sup>13</sup>

22. In section 8.1 of the SATR NID, the AESO provided a Pincher Creek Area Planning Concept including the following drawing that illustrated, *inter alia*, the Goose Lake to Crowsnest 240 kV double circuit transmission line connecting to Castle Rock Ridge (shown as #524). In the SATR NID, the AESO also described that its Pincher Creek Area Planning Concept included looping the proposed Goose Lake to Crowsnest 240 kV line in-and-out of the new Fidler substation.<sup>14</sup>

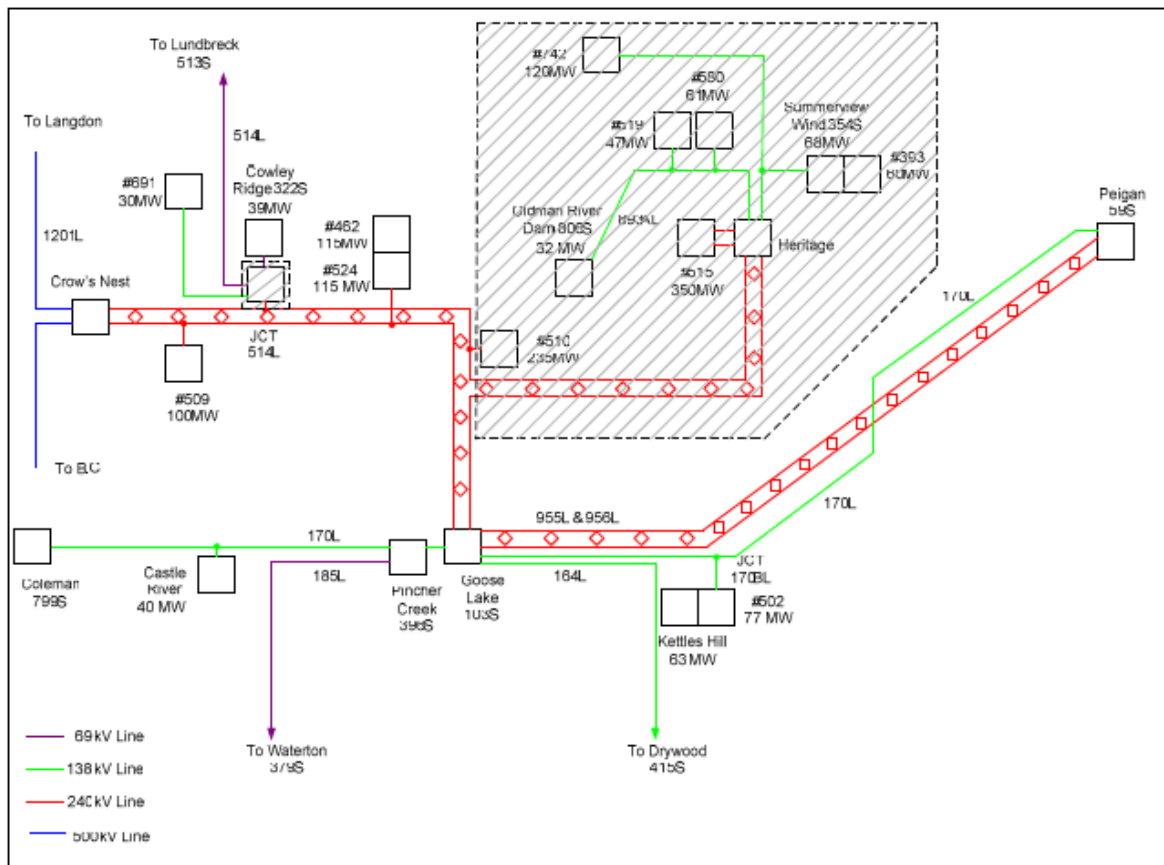
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<sup>13</sup> SATR NID, section 7.1.6

<sup>14</sup> SATR NID, section 8.1, page 73 (Fidler substation previously referred to as Heritage substation)

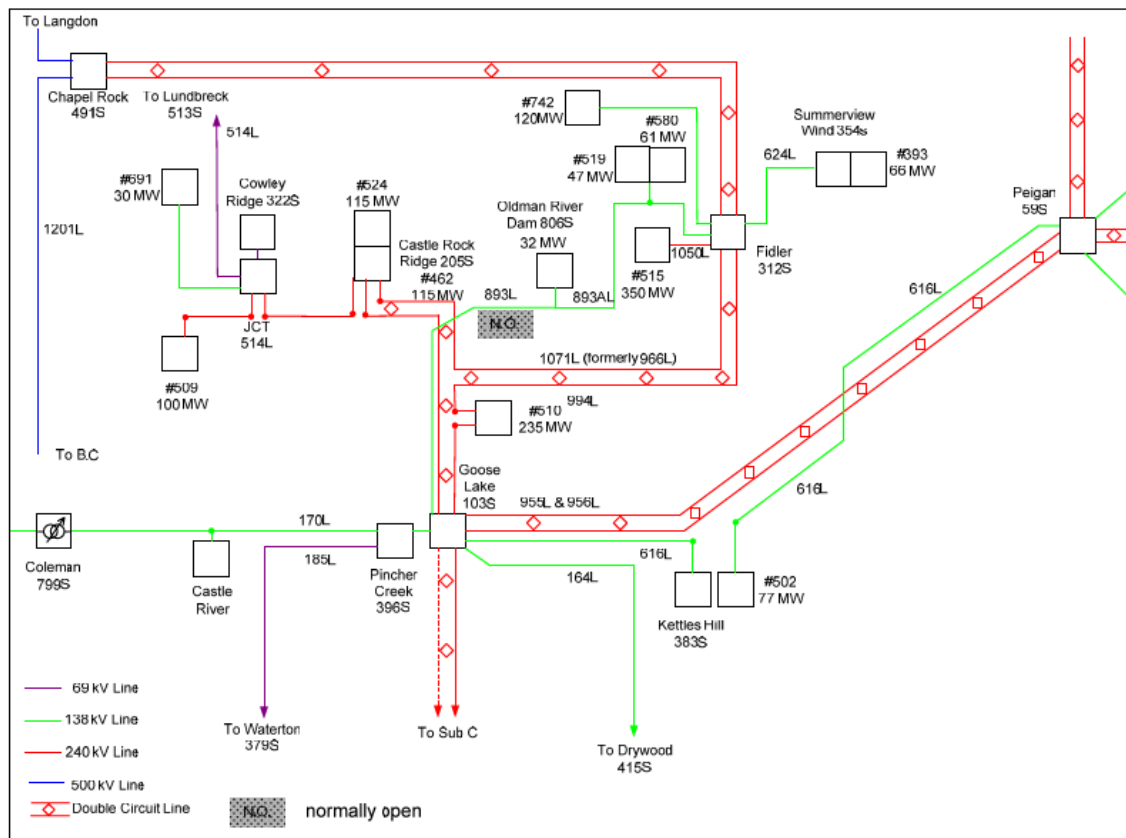


Figure 1 – SATR NID Pincher Creek Area Development Concept



23. In the Original Fidler NID, the AESO explained that it had revised its Pincher Creek development concept and included the following drawing (Figure 2) that illustrated, *inter alia*, the AESO's revised plan for the Goose Lake to Chapel Rock 491S (previously, Crowsnest) 240 kV double circuit transmission line connecting to the Fidler 312S substation.

**Figure 2 – Original Fidler NID Pincher Creek Area Development Concept**



24. In *Decision 2011-468*, the Commission found “that the identification of facility location at a high or macro level – at least sufficiently to meet the requirements of AUC Rule 007 and to afford procedural fairness to landowners potentially affected in NID approval proceedings – is an essential component of the means or manner of satisfying need requiring approval under Section 34 of the Electric Utilities Act”<sup>15</sup> and that “The development concept and mapping

<sup>15</sup> *Decision 2011-468*, paragraph 69



information provided by the AESO in its SATR NID application indicated transmission facilities planned from somewhere along Highway 3 from Lethbridge to Crowsnest Pass. Nothing in the NID application suggested transmission line locations under consideration in the SATR NID proceeding going north and west of Goose Lake through the Livingstone/Porcupine Hills area.”<sup>16</sup>

25. As a result of these findings and the factors affecting the siting of the Crowsnest substation described below, the AESO has reviewed options to meet the need for a new 500/240 kV substation tapping the existing 1201L 500 kV transmission line and the 240 kV double circuit transmission line connecting to the Goose Lake 103S substation. In completing this review, the AESO identified two alternatives to connect Goose Lake 103S substation through either Fidler 312S substation or Castle Rock Ridge 205S substation before terminating at the proposed Chapel Rock 491S substation. The AESO has notified stakeholders within the proposed development areas for the two alternatives and is now filing this Application with the Commission.

#### **Substitution of Chapel Rock 491S Substation for the Crowsnest Substation**

26. In this Application, the AESO is applying, in part, to amend the SATR NID Approval to replace references to Crowsnest substation with Chapel Rock 491S substation.
27. In respect of the new 500/240 kV substation, the AESO requires only that the substation be constructed close to, and tap, the existing 1201L 500kV line between Langdon 102S and BC Hydro’s Cranbrook substation. Specific siting considerations and recommendations will form part of the related AltaLink facility application that will be submitted for Commission approval following the Commission’s decision on this Application.
28. From 2010 to 2011, the AESO issued various directions to AltaLink Management Ltd. (AltaLink), as the legal owner of transmission facilities in the area, including directions to prepare transmission facility applications to meet the need identified in the SATR NID.
29. AltaLink advised the AESO that as a result of work conducted in the preparation of its facility applications, it identified various potential sites for the new 500/240 kV substation tapping the existing 1201L. By letter dated August 5, 2011, appended hereto as Attachment 1, AltaLink has provided an explanation of the factors influencing the potential siting of the proposed substation, which has now been designated Chapel Rock 491S.

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<sup>16</sup> *Decision 2011-468*, paragraph 75

### **Reactive Power Requirements at Chapel Rock 491S Substation**

30. In this Application, the AESO is also applying to amend the SATR NID Approval to replace the SVC (Static Voltage Control) at Crowsnest substation with one SVS (Static VAR System) and one shunt reactor at Chapel Rock 491S substation.
31. In the SATR NID, the AESO recommended, and the Commission approved, static and dynamic reactive power support at various locations in southern Alberta including a 0 to +400 MVar SVC at Crowsnest substation.<sup>17</sup> In order to optimize system reactive power in the area, the AESO performed the South Region Reactive Power Requirement Study, dated September 13, 2012, attached hereto as Attachment 2. The study results indicate that a +200/-100 MVar SVC in addition to two 100 MVar 240 kV capacitor banks in a SVS configuration and a 45 MVar reactor are required at Chapel Rock 491S substation to provide the required dynamic reactive power needs under contingency conditions.

### **Goose Lake to Chapel Rock Double Circuit 240 kV Line**

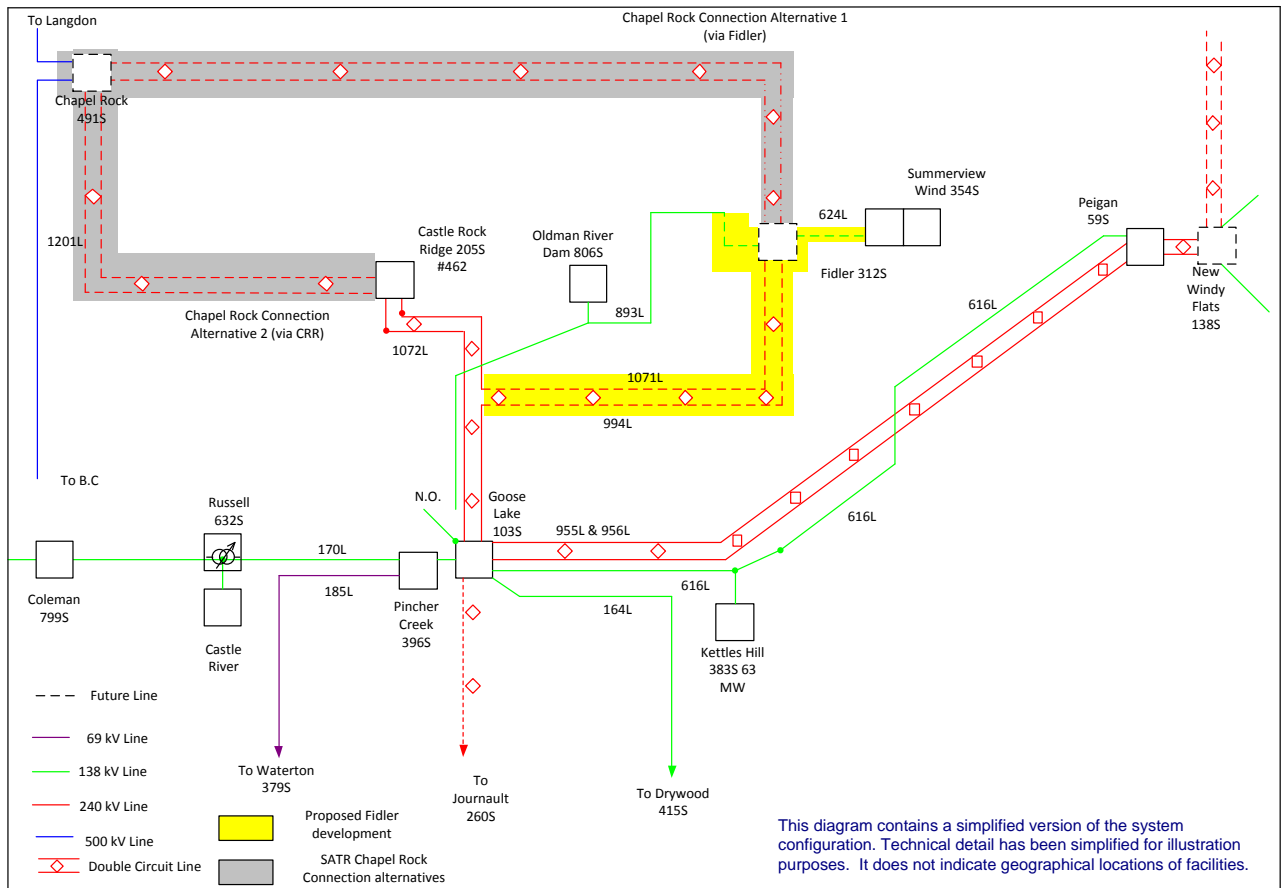
32. In this Application, the AESO is also applying to amend the SATR NID Approval to replace the double circuit 240 kV transmission line connecting Goose Lake 103S substation to Crowsnest substation with a 240-kV double-circuit transmission line connecting Goose Lake 103S substation to Chapel Rock 491S substation.
33. As further described below, the AESO has identified two feasible alternatives to meet the need for a new double circuit 240 kV transmission line connecting Goose Lake 103S substation to Chapel Rock 491S substation (Chapel Rock Connection).<sup>18</sup> In Alternative 1 (via Fidler), the 240 kV line from Goose Lake 103S would connect to Fidler 312S before terminating at Chapel Rock 491S. In Alternative 2 (via CRR), the 240 kV line from Goose Lake 103S would connect to Castle Rock Ridge 205S before terminating at Chapel Rock 491S substation. The two Chapel Rock Connection alternatives are illustrated in Figure 3, below.

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<sup>17</sup> SATR NID, Table 7-2, Item II-6; SATR NID Approval Stage II, paragraph 3.

<sup>18</sup> Chapel Rock Connection, as defined, includes only the proposed double circuit 240 kV line and terminations and specifically excludes Chapel Rock 491S substation which does not differ between the alternatives presented.

**Figure 3 – Chapel Rock Connection Alternatives**



### **Recommended Alternative – Chapel Rock Connection**

34. The AESO has considered technical, economic and land impact factors and feedback gathered from stakeholders regarding the Chapel Rock Connection alternatives and selected Alternative 2 (via CRR) as its preferred option, for the reasons provided below.

### **Chapel Rock Connection - Technical Considerations**

35. In preparation of its Fidler Collector NID, the AESO reviewed the transmission system impact of the proposed Fidler developments over the near term (2015) and the long term (2022). The long term assessment included the Fidler 312S substation evaluation with either of the Chapel Rock Connection alternatives in place. The AESO's *Goose Lake to Chapel Rock Alternatives System Planning Study Report* (Study) is included as Attachment 3.
36. Load and generation assumptions used in the Study are consistent with the AESO 2012 Long-term Outlook and include assumptions regarding the timing and location of future generation sources in accordance with section 33(1) of the EUA and section 8 of the Transmission Regulation, AR 86/2007.<sup>19</sup> Specifically, the AESO allocated forecast wind capacity additions in the following order: first to projects under construction, then to projects in the NE of Pincher Creek area and then to projects in the north of Pincher creek area. Any remaining forecast capacity additions were allocated to projects throughout the province. The AESO's *South Region Load and Generation Forecasts*, which provides background to the forecast assumptions used in the Study, is included as Attachment 4.
37. The AESO performed power flow, transient stability, short circuit, system losses, and transfer capability analyses to assess the transmission system performance in 2022 for each of the Chapel Rock Connection alternatives with Fidler 312S in service.
38. Based on the Study assumptions, the power flow analysis indicates that Alternative 1 (via Fidler) and Alternative 2 (via CRR) would each provide sufficient capacity to accommodate forecast load and expected generation in the study area in the long term and that neither of the two alternatives would adversely impact the transmission system under Category A (system normal) or Category B (single element contingency) conditions.
39. As described below, each of the two Chapel Rock Connection alternatives may require the AESO to establish operational or remedial action measures under Category C (double element contingency) conditions.

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<sup>19</sup> The AESO 2012 Long-term Outlook is available at <http://www.aeso.ca/transmission/8638.html>

- Alternative 2 (via CRR) – double circuit contingency of the 240 kV 1071L/994L from Goose Lake 103S to Fidler 312S would result in loss of up to 693 MW of generation at Fidler 312S.
  - Alternative 1 (via Fidler) and Alternative 2 (via CRR) – double circuit contingency of the 240 kV 955L/956L from Goose Lake 103S to Peigan 59S would result in thermal overloading on the 138 kV 616L from Goose Lake 103S to Peigan 59S.
40. Based on the transient stability analysis and assumptions, the transmission system would remain stable for both Chapel Rock Connection alternatives under Category B and studied Category C (two element contingency) conditions. Under Category C5 contingencies<sup>20</sup>, the analysis indicates that up to 693 MW of generation at Fidler 312S substation could be lost with Alternative 2 (via CRR) but also demonstrates that the transmission system would remain stable under the studied contingency. However, Alternative 2 (via CRR) would continue to meet Alberta Reliability Standards as the AESO would develop appropriate operating procedures to mitigate the C5 constraint, if required.<sup>21</sup> There would be no system impact with Alternative 1 (via Fidler).
41. Connection of the Chapel Rock 491S substation will create two major transmission paths out of the Pincher Creek area. The AESO compared the transfer capability from the area for the two Chapel Rock Connection alternatives assuming various system conditions. The Study shows that the alternatives would have similar transfer capability for all but one of the studied scenarios: under high export conditions – Alternative 1 (via Fidler) would allow an additional 14% (220 MW) of wind generation to be connected in the Pincher Creek area. However, both of the Chapel Rock Connection alternatives would have sufficient capacity to accommodate existing and applied-for generation in the area for the long-term.
42. The Study shows that both of the Chapel Rock Connection alternatives are technically feasible, would have a similar impact on the transmission system and would meet the need identified in the SATR NID for transmission reinforcement in southern Alberta to deliver additional generation on a firm basis to the AIES.<sup>22</sup> Given this similarity between the two alternatives, the AESO has relied on the following economic considerations, land impact assessments and the results of its participant involvement program to select Alternative 2 (via CRR) as its preferred option to meet the need identified in the SATR NID.

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<sup>20</sup> In this case, a common tower failure between Fidler 312S and the tap point on 1071L.

<sup>21</sup> The AESO develops appropriate ISO Rules (including remedial action schemes) and practices to address transmission constraints that may materialize from time to time. The creation and management of such ISO rules pertain to operational matters that are beyond the scope of this application.

<sup>22</sup> SATR NID Executive Summary, page i.

### Chapel Rock Connection – Economic Considerations

43. The SATR NID included an original estimated cost of approximately \$201 million (+30/-15%, 2008\$, without escalation or allowance for funds used during construction) for the Crowsnest substation and Goose Lake to Crowsnest 240 kV transmission line.<sup>23</sup>
44. Including Chapel Rock 491S substation, AltaLink currently estimates the cost of Alternative 1 (via Fidler) to be in the order of \$331 to \$363 million (+30/-30%, 2016\$) and the cost of Alternative 2 (via CRR) to be in the order of \$311 to \$323 million (+30/-30%, 2016\$).<sup>24</sup> A copy of the AltaLink estimates is included in Attachment 5.
45. As described in section 6.4 of the Study, total southwest Alberta system losses are similar under each of the Chapel Rock Connection alternatives at approximately 57 MW for the summer peak scenario and 51 MW for the summer light scenario for the 2022 study year. There is no economic advantage in respect of losses to either of the alternatives.

### Chapel Rock Connection – Land Impact Assessment

46. In preparation of its Fidler Collector NID, the AESO directed AltaLink to conduct an assessment in accordance with Commission Rule 007, Section 6.1, NID12. Having regard for the fact that specific routing and siting aspects are not addressed as part of this amendment application, the assessment uses a qualitative approach to assess potential land impacts. A copy of the AltaLink *Land Impact Assessment for the Fidler 312 Interconnection NID and Pincher Creek to Chapel Rock SATR NID Amendment* (LIA) is included as Attachment 6.
47. The LIA includes, among other things, an assessment of the impacts of the two Chapel Rock Connection alternatives. Following review of the available data, the application of suitable indicators and assessment of the study area, no factors were identified that either preclude or indicate a superior alternative.
48. Each of the Chapel Rock Connection alternatives is expected to have some level of socio-environmental impact. In general, Alternative 2 (via CRR) has the potential for fewer socio-environmental impacts as the range of possible line lengths is, on average, shorter than that of Alternative 1 (via Fidler).
49. The LIA does not include analysis of specific routes or sites. The AESO expects that impacts associated with specific routes and substation locations will be considered in the development of AltaLink's facility proposal.

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<sup>23</sup> SATR NID, Table 7-2 Item II-6 plus Item II-7.

<sup>24</sup> The Alternative 2 (via CRR) AltaLink cost estimate does not include the revised system related costs in respect of the CRR NID described in paragraph 14.



### **Chapel Rock Connection – Participant Involvement Program**

50. The AESO conducted a participant involvement program (PIP) in accordance with the requirements of NID13 and Appendix A of Commission Rule 007 *Applications for Power Plants, Substations, Transmission Lines and Industrial System Designations*. The AESO utilized various methods to notify stakeholders of this Application, including holding seven open houses during which the AESO received questions and comments from stakeholders. The AESO responded to questions and comments received from stakeholders during the open houses and provided answers within its open house summary report which was made available to those that requested it. The AESO has also responded to stakeholders during stakeholder meetings and to those that contacted the AESO directly. The AESO believes that all comments and questions regarding this Application have been properly addressed. A report summarizing the AESO's PIP is included as Attachment 7.
51. As part of its PIP for this Application, the AESO presented each of the Chapel Rock Connection alternatives, described the status of its alternative evaluations and solicited stakeholder preferences between the two alternatives. Of the stakeholders that indicated a preference between the two alternatives, a greater number of stakeholders declared a preference for Alternative 2 (via CRR).
52. The PIP also included maps indicating the approximate area where the Proposed Amendments are needed. As illustrated in Attachment 8, the potential Goose Lake to Chapel Rock development area extends outside of the area originally approved by the Commission in *Decision 2009-126*, Appendix C.

### **The Need for Transmission Reinforcement Remains the Same as Identified in the SATR NID**

53. In the SATR NID, the AESO explained that the need for transmission reinforcement in southern Alberta is driven predominantly by the forecast development of wind generation and the limited capability of the transmission system to deliver additional generation on a firm basis to the AIES.<sup>25</sup> The AESO recommended, and the Commission approved, the construction of a 240 kV looped system in southern Alberta that would enable connection of the forecast wind power.<sup>26</sup>
54. This Application seeks to amend specific components of the SATR NID Approval and does not change the need for the expansion or enhancement of the capability of the transmission system described in the SATR NID.

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<sup>25</sup> SATR NID Executive Summary, page i.

<sup>26</sup> SATR NID Executive Summary, page ii.

**Request for Approval**

55. Having regard to: the relevant provisions of the EUA and the AUCA; Commission *Decision 2011-468*; the transmission responsibilities of the AESO as set out in the EUA and the *Transmission Regulation*; information obtained from the system planning studies undertaken by the AESO; the AESO's PIP; AltaLink's estimated costs and LIA; and the AESO's long-term transmission system plans, it is the conclusion of the AESO that its assessment of the proposed amendments is technically complete and that the proposed amendments are in the public interest.

56. In consideration of these factors, the AESO requests that the Commission:

- (a) approve the amendments to the SATR NID Approval as described herein,
- (b) approve the withdrawal of Application No. 1607580, and
- (c) grant such further relief as may be necessary to give effect to this Application.

Please address all correspondence concerning this application to:

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Yours very truly,



Doyle Sullivan, P. Eng.  
Director, Regulatory Services