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:**	Mark Thompson
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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**.	No comment.
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	No comment.

	storage of the interval data that is used for financial settlement with the **ISO**.	
3. Rental Meters	a) Please describe the circumstances under which your business would choose to install rental meters.	At this point in time, TCE is not aware of a circumstance under which it would install a rental meter.
	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.	No comment.
4. Back-up Meters	a) Please describe the circumstances under which your business would choose to install a back-up meter.	At this point in time, TCE is not aware of a circumstance under which it would install a back-up meter. TCE submits that its current system without back-up meters has been operating efficiently and that there is no need for the additional expense of back-up meters.
	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, please see the response to 4(a) above.
	c) Additionally, please provide the estimated installation and operating costs for a back-up meter as well as annual maintenance costs, if any.	No comment.
5. Shared Current Transformers	a) Please indicate whether your organization has installed meters that share CTs. If so, how many and under what conditions?	No.
	b) Have you experienced any issues with the meters that share CTs, such as increased meter measurement error?	N/A.
	c) Does your organization think the proposed Section 502.10 should incorporate requirements regarding the sharing of CTs?	N/A.

6. MW Class Determination	a) How is MW class currently being calculated for in-situ testing.	The MW class is currently being calculated by the metering service provider.
	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. No, TCE submits that the month-to-month period selected does not impact the data set. A yearly average is sufficient and there is no need to adopt a standard timeframe. ii. No comment. iii. Since a revenue meter is operational in all hours regardless of the MWs flowing through an individual metering system, 0 MW intervals should be factored into the methodology for determining the MW class. Please also refer to the response to section v. below. iv. There is no need for a notification requirement. v. Since a revenue meter is operational in all hours regardless of the MWs flowing through an individual metering system, TCE submits that the Measurement Canada testing interval of 6 years may be appropriate for all revenue meters. That said, the AESO's proposed change to a 2-year and 4-year testing frequency based on MW class is reasonable. vi. Please refer to the response to section v. above.

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?	TCE is unable to comment as to what the "reasonable methods" should be at this time. However, it would be preferable for the AESO to define in the rule what it considers the reasonable methods to be so that the party responsible for meeting the requirement knows in advance rather than after-the-fact.
8. Measurement data errors	In subsection 9 of proposed new Section 502.10, should the AESO set a threshold for the measurement data error?	Yes, otherwise inconsequential errors could trigger significant and unnecessary work.
9. Do you have any other comments regarding the proposed new Section 502.10?		1. Are the accuracy classes listed in proposed sections 5(2)(a) and 5(3)(a) based on nameplate metering point capacity or an average (seasonal, yearly, etc)? 2. The AESO's proposed (clean) version for the definition of "metered energy" does not match the proposed (blackline) version. The words ", in MWh," should be inserted after the words "electric energy". "**metered energy"** means the quantity of electric energy transferred to a **point of delivery** or from a **point of supply**, in MWh, reflected by the relevant **metering equipment** during a particular period of time. "**metered energy"** means the quantity of electric energy ~~transferred to a **point of delivery** or from a **point of supply**,~~ in MWh, ~~reflected~~ measured by the relevant **metering equipment** during a particular period of time. "**metered energy**" means the quantity of electric energy measured by the relevant **metering equipment** during a particular period of time.