

August 28, 2024

Laura Johnson
Alberta Utilities Commission
Eau Claire Tower
1400, 500 Third Avenue SW
Calgary, AB T2P 0B5

Dear Laura,

**Re: Bulletin 2024-08, AUC Rule 007 Consultation
Alberta Electric System Operator (AESO) Comments**

On May 2, 2024, the Commission issued Bulletin 2024-08, seeking feedback on Rule 007: *Application for Power Plants, Substations, Transmission Lines, Industrial System Designations, Hydro Developments, and Gas Utility Pipelines*. The AUC invited feedback on any ambiguities, clarifications, or opportunities for increased efficiency related to Rule 007.

The AESO has conducted a review of Rule 007 and appreciates the opportunity to present comments. The proposed modifications by AESO are designed to reduce regulatory burdens, address concerns regarding the sharing of generator-owned collector substations and facilitate the transfer of system transmission contracts among generators. Specifically, the AESO's proposed changes will:

1. increase the system cost limit for ANID applications from \$5 million to \$15 million to provide consistency with ANAP projects;
2. address transmission planning issues when market participants holding ownership of collector substations wish to transfer ownership to other entities; and
3. ensure the applicant of a powerplants and associated substations will remain under the same applicant, limiting the risk of ownership configuration issues.

The AESO has enclosed a concordance table illustrating the AESO's proposed changes and providing the AESO's rationale for these changes. The AESO thanks the Commission for the opportunity to provide comments on AUC Rule 007 and is available to explain our proposals should that be required.

Please contact the undersigned if you have any questions.

Sincerely,

<electronically submitted>

Jodi Marshall
Director, Law (Grid)

Public