

NOTICE TO PARTICIPANTS AND STAKEHOLDERS

May 12, 2020

Re: Compliance Review 2019

Pursuant to section 23(2) of the *Transmission Regulation*, the MSA is required to make available to the public an annual report related to its compliance activities. In fulfillment of this requirement for 2019, attached is the MSA's Compliance Review 2019.

The MSA's next annual report related to these matters will be published in early 2021. In the intervening time, the MSA will provide public updates regarding its compliance activities in its Quarterly Reports. The Quarterly Report for Q1 2020 will be published this month.

Sincerely,

Derek Olmstead

Market Surveillance Administrator

Compliance Review 2019

May 12, 2020

Taking action to promote effective competition and a culture of compliance and accountability in Alberta's electricity and retail natural gas markets

www.albertamsa.ca

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EXECUTIVE SUMMARY

The Market Surveillance Administrator (MSA) is a public agency established under the *Alberta Utilities Commission Act* (AUCA) whose mandate includes surveillance, investigation and enforcement of the Alberta electricity markets (Markets).

This Compliance Review 2019 is provided pursuant to section 23(2) of the *Transmission Regulation* for the calendar year 2019 (2019 Review).

Promotion of compliance and accountability

The MSA's activities benefit Albertans by ensuring Markets are competitive and that there is a well-functioning and dependable electricity sector. Through these activities the MSA contributes to the reliability, efficiency and competitiveness of the Markets and promotes a culture of compliance and accountability among those persons participating in those Markets.

ISO rules and Alberta Reliability Standards in Markets

Rules are established in Alberta by the Independent System Operator, operating as the Alberta Electric System Operator (AESO), in consultation with market participants and submitted to the Alberta Utilities Commission (AUC) for approval (ISO rules). The purpose of ISO rules is to promote orderly and predictable actions by those participating in the Markets and to support the role of the AESO.

As set out in the *Transmission Regulation*, the AESO, in consultation with the electricity industry, reviews North American Electric Reliability Corporation (NERC) and Western Electricity Coordinating Council (WECC) standards to assess and recommend to the AUC, whether or not those standards are applicable to Alberta. If approved as an Alberta reliability standard (ARS) the AESO and market participants must comply with the ARS, as applicable.

The purpose of ARS is to ensure that the AESO and those market participants involved in grid operations in Alberta (e.g., generators, transmission operators) are doing their part by way of procedures, communication, coordination, training and maintenance, among other practices, to support the reliability of the Alberta interconnected electric system. Given the scope of the AESO's responsibilities, the bulk of ARS apply to the AESO, and a smaller (but sometimes overlapping) fraction of ARS apply to market participants.

Enforcement framework

In Alberta, the AESO has a mandate to conduct compliance monitoring of market participants. The AESO applies its technical and operational expertise to identify suspected ISO rule and ARS contraventions by market participants and refers these to the MSA for action. The AESO is also required to refer its own suspected contraventions of ISO rules and ARS to the MSA for action.

The MSA's compliance process encourages market participants to self-report issues of non-compliance with ISO rules and ARS with the prospect of favourable treatment in order to promote self-monitoring and robust compliance programs in the industry.

Subject to completion of its compliance process as a result of AESO referrals or by self-reports, the MSA determines the appropriate disposition. For example, it may determine not to pursue the matter further or to pursue financial penalties for contraventions of ARS or ISO rules. AUC Rules 019 and 027 authorize the MSA to issue notices of "specified penalty" as prescribed in those rules. Alternatively, the MSA can enter into a settlement agreement concerning a contravention or request a hearing before the AUC. In either case, the AUC approves the outcome. If a party disputes a notice of specified penalty, the matter is settled by way of a hearing before the AUC.

Reporting Approach

For this 2019 Review, we have focused on ISO rules and operations and planning ARS (O&P ARS) and have summarized compliance matters we received by referral or by self-report, and how those matters were distributed amongst various ISO rules and ARS. We have summarized enforcement activities in terms of the MSA's issuance of specified penalties by ISO rule and ARS.

The MSA has requested that the AUC consult on the public reporting of critical infrastructure protection (CIP) ARS breaches. Therefore, the MSA has deferred reporting on CIP ARS matters until this consultation has been completed.¹

2019 Outcomes

The overall number of ISO rules compliance matters addressed² in 2019 increased from 2018. While the number of addressed ISO rules referrals from the AESO increased, self-reports submitted by market participants continued to represent a large majority of the events we assessed, indicating that market participants continue to actively monitor for, and self-disclose, events of non-compliance. The distribution of contraventions across ISO rules was broadly similar to previous years as ISO rules governing the most frequent day-to-day market activities accounted for the majority of compliance matters. Most notices of specified penalty issued in 2019 were for first contraventions within a 12-month period, which is indicative of the fact there were few persistent problems found in compliance with ISO rules.

The number of O&P ARS matters addressed decreased from 2018 to 2019. One of the main reasons for this was that in 2019 the MSA prioritized addressing a backlog of CIP ARS matters.

¹ See the MSA's [Interim Compliance Report](#) for the period January 2018 through November 2019.

² An ISO rules compliance matter is considered to be addressed once a disposition has been issued.

2019 NUMBERS AT A GLANCE

- 593 ISO rules compliance matters were addressed in 2019, up from 467 matters addressed in 2018.
- Self-reporting accounted for 81% of ISO rules compliance matters addressed by the MSA, slightly down from 83% in 2018.
- 181 notices of specified penalty were issued for contraventions of ISO rules for a total of \$326,000 in financial penalties. No specified penalties were disputed or remained unpaid as of the date of publication.
- 63% of the notices of specified penalty issued for ISO rules in 2019 were for first contraventions over a 12-month period.
- 16 operations and planning ARS compliance matters were addressed in 2019, down from 36 matters addressed in 2018.
- 6 matters relating to ARS were addressed in 2019 by notices of specified penalty, totaling \$50,000 in financial penalties. No specified penalties were disputed or remained unpaid.

1. INTRODUCTION

The MSA has a broad mandate of surveillance, investigation, and enforcement in respect of the Markets. Through enforcement of ISO rules and ARS, the MSA contributes to the reliability and competitiveness of the Alberta interconnected electric system and promotes a culture of compliance and accountability among the AESO and market participants.

Market participants play a crucial role in promoting compliance. As such, the MSA encourages market participants to self-report instances of non-compliance. When self-reporting, market participants are invited to set out a case for forbearance by the MSA if they are able to demonstrate how section 23.1 of the *Transmission Regulation* has been satisfied.

The MSA works collaboratively with the AESO and the WECC regarding compliance issues, including the referral of suspected contraventions to the MSA and the interpretation of ISO rules and ARS. These entities also provide the MSA with subject matter expertise and technical assessments for matters under consideration, upon request. This collaboration continues to pay dividends, ensuring rigorous enforcement decisions are made by the MSA, while processes are refined to enhance efficiency.

2. ALBERTA UTILITIES COMMISSION RULE DEVELOPMENTS

No changes were made to AUC Rule 019 or AUC Rule 027 in 2019. However, the AUC has initiated consultations on changes to AUC Rule 027 in 2020.³

3. ISO RULES

3.1. Activity levels

In 2019, the MSA addressed 593 ISO rules compliance matters and had 69 unresolved at the end of the year. Of the 593 files, 181 (31%) resulted in a notice of specified penalty, 346 (58%) resulted in forbearance by the MSA, and 66 (11%) were rejected, withdrawn, or issued a no breach or compliance exception disposition.⁴ No compliance matters were brought before the AUC for a hearing or other proceeding, and none of the notices of specified penalty were disputed or remained unpaid.

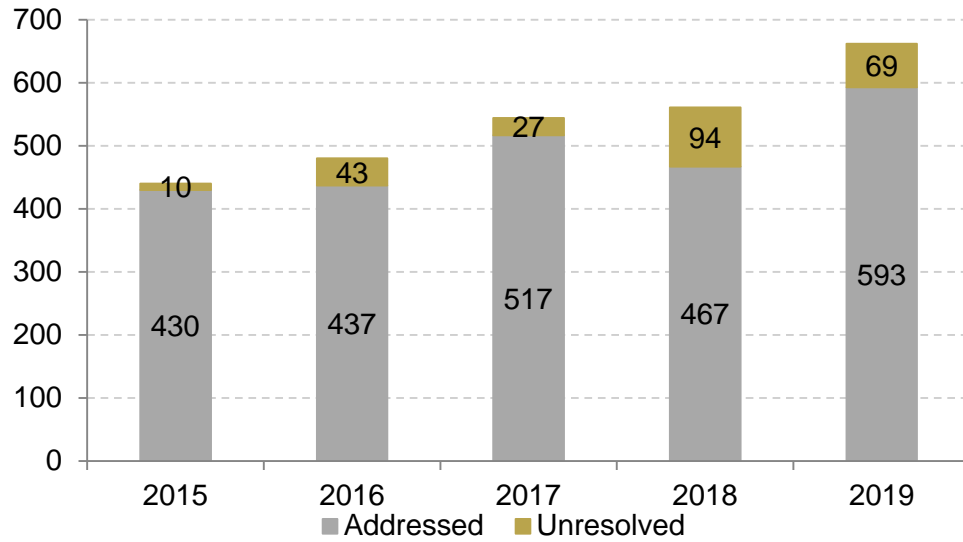
In 2018, the MSA addressed 467 ISO rules compliance matters and had 94 matters unresolved at the end of the year. Of the 467 files, 57 (12%) resulted in a notice of specified penalty, 410 (88%) resulted in forbearance by the MSA, and zero were rejected or withdrawn. As Figure 1

³ See AUC [Bulletin 2020-03](#), January 31, 2020.

⁴ A matter may be rejected if it is not complete or pertains to conduct not self-identified by the market participant. Market participants may request that a self-report be withdrawn. The MSA may issue no breach or compliance exception dispositions when the specific conduct at issue has not breached the requirements of the ISO rules or meets a specific compliance exception outlined in the ISO rules.

indicates, the number of ISO rules compliance matters received and/or addressed in 2019 increased compared to previous years.

Figure 1: ISO rules compliance matters addressed or unresolved⁵



⁵ As unresolved matters are analyzed/reviewed, changes to this figure may occur.

Table 1 shows the number of forbearance dispositions and notices of specified penalties issued for select sections of ISO rules matters.

*Table 1: ISO rules compliance decisions: Forbearances and penalties
(% of the total shown in parentheses)⁶*

Section of ISO Rules	Total	Forbearance	Notice of Specified Penalty
201.3	12	7 (58%)	5 (42%)
201.7	46	26 (57%)	20 (43%)
203.3	97	72 (74%)	25 (26%)
203.4	105	69 (66%)	36 (34%)
203.6	43	30 (70%)	13 (30%)
205.3	29	17 (59%)	12 (41%)
205.5	18	4 (22%)	14 (78%)
205.6	33	4 (12%)	29 (88%)
205.8	5	3 (60%)	2 (40%)
303.1	13	1 (8%)	12 (92%)
304.9	5	5 (100%)	(0%)
306.4	10	7 (70%)	3 (30%)
306.5	13	8 (62%)	5 (38%)
502.6	6	6 (100%)	(0%)
Total	435	259 (60%)	176 (40%)

The sections of ISO rules listed in Table 1 fall into the following categories:

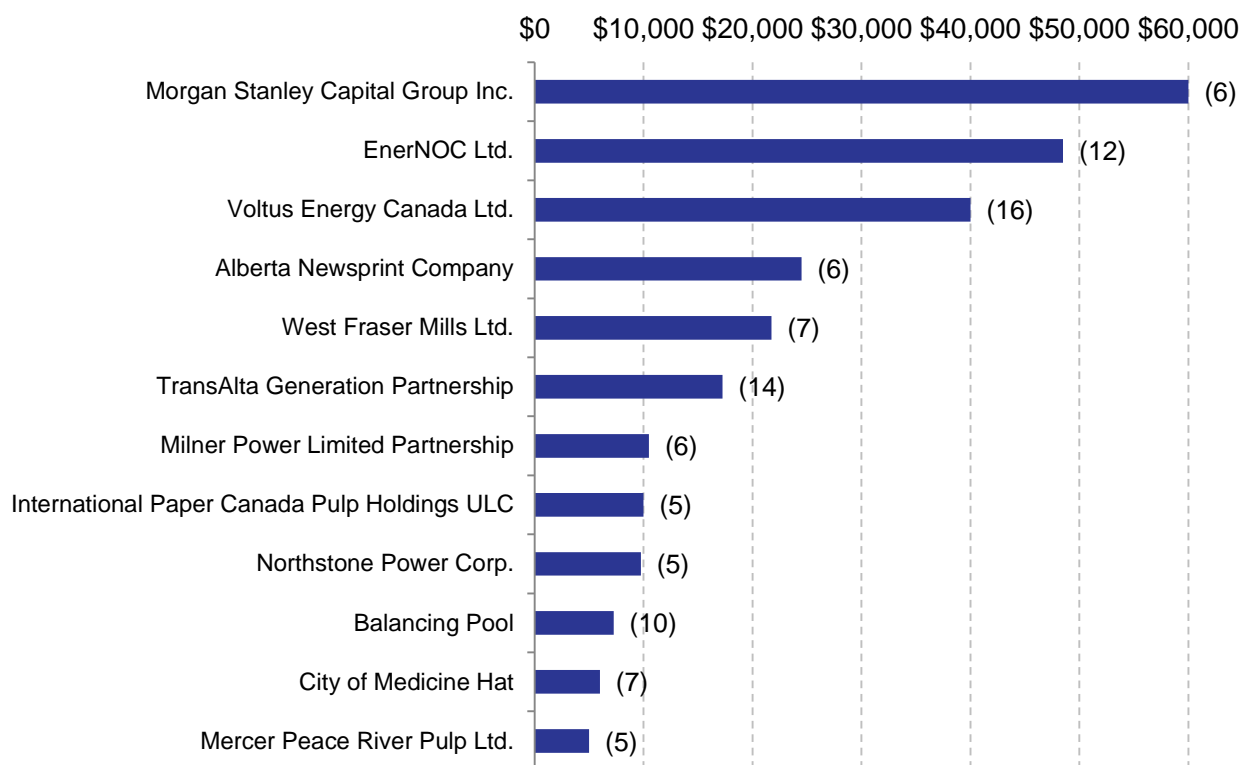
- 201 General (Markets)
- 203 Energy Market
- 205 Ancillary Services Market
- 303 Interties
- 304 Routine Operations
- 306 Outages and Disturbances
- 502 Technical Requirements

In 2019, the MSA issued 181 notices of specified penalty for ISO rules compliance matters involving 51 market participants, resulting in a total financial amount of \$326,000. In 2018, the MSA issued 57 notices of specified penalty across 28 market participants, totaling \$132,000. As indicated in Figure 2 and Appendix A, Table A2, seven market participants were issued more than \$10,000 each in total notices of specified penalty over this period. The percentage of

⁶This table reports on sections of the ISO rules with five or more matters during this period that were addressed with forbearance or notice of specified penalty, and excludes operating reserve dispatch matters. See Appendix A for full details.

specified penalties issued for first contraventions declined to 63% in 2019 from 68% in 2018. Despite this decrease, the high proportion of first contraventions remains a positive indicator that ISO rules contraventions are not indicative of systemic problems. Among the balance of specified penalties issued in 2019, 18% were second contraventions, 6% were third contraventions, and the fourth or more contraventions accounted for 13% notices of specified penalty. Higher frequency contraventions attract greater specified penalties as per AUC Rule 019.

Figure 2: Total specified penalties for contraventions of ISO rules by market participant (number of penalties in parentheses)⁷



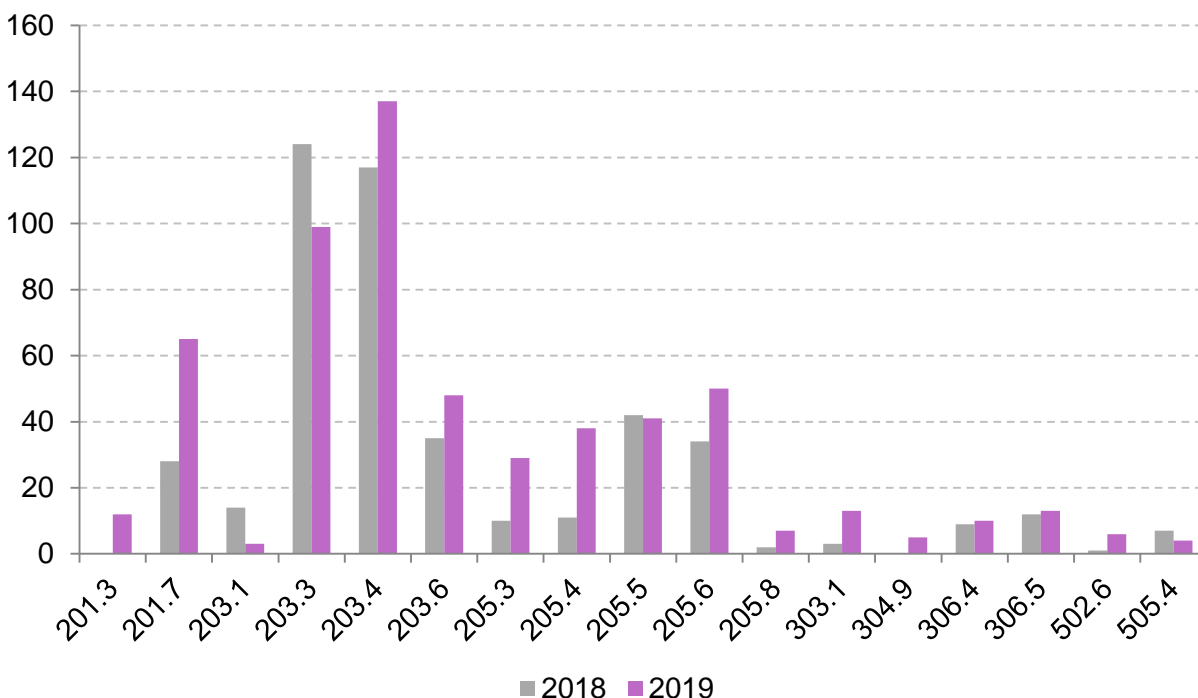
In 2019, 28 different sections of ISO rules were identified in self-reports and referrals,⁸ as compared to 34 sections in 2018. There were not large changes in the sections of ISO rules compliance matters that were addressed between 2018 and 2019, except that there was a drop in the share of section 203.3 addressed files and an increase in the share of section 201.7 addressed files. As seen in Figure 3 and Table A1, the majority of matters reviewed by the MSA

⁷ Only issued and paid penalties totaling \$5,000 or higher are reported in this figure. See Appendix A for full details. The number of notices of specified penalty issued and the total dollar amount are not always correlated, due to the differences in penalty category and the escalation of penalty for repeated contraventions as set out in AUC Rule 019.

⁸ See Table A1.

relate to ISO rules governing the most common day-to-day market activities, such as: the submission of energy restatements (section 203.3); delivery of energy or operating reserves in response to a dispatch or directive (sections 203.4 for energy and 205.4 through 205.6 for operating reserves); and acknowledging dispatches (section 201.7).

Figure 3: 2018 and 2019 addressed files (only sections where there were at least five addressed files in one year are shown)



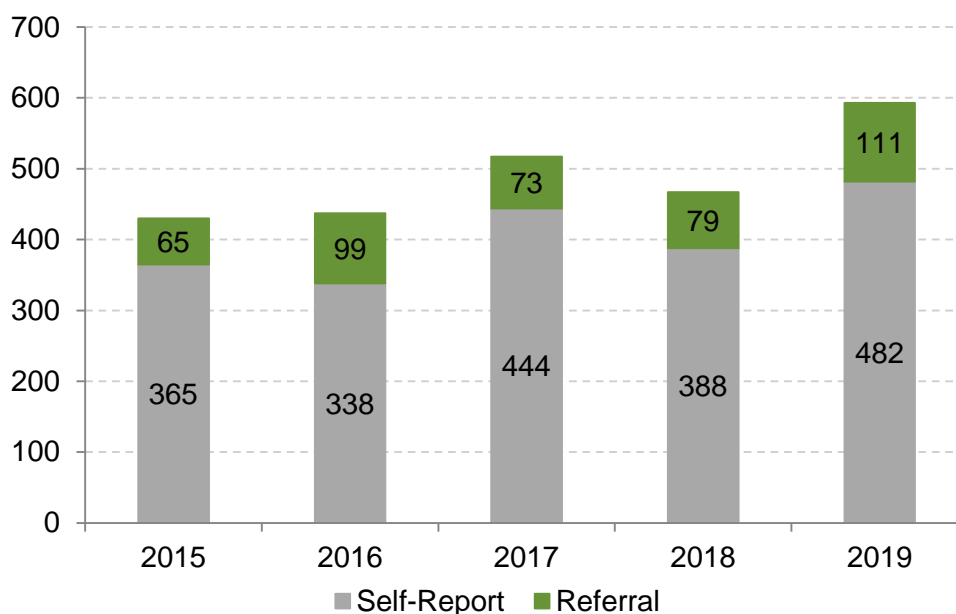
The sections of ISO rules listed in Figure 3 fall into the following categories:

- 201 General (Markets)
- 203 Energy Market
- 205 Ancillary Services Market
- 303 Interties
- 304 Routine Operations
- 306 Outages and Disturbances
- 502 Technical Requirements
- 505 Legal Owners of Generating Facilities

The MSA addressed 482 ISO rules compliance matters that were received via self-report and 111 matters that were received through AESO referrals (81% and 19% of total matters addressed in the year, respectively). The number of referral matters addressed in 2019 was larger than in 2018. However, there was a change in the proportion of sections that were referred (and addressed) in each year. The share of sections 203.3, 203.6 and 203.1 referrals decreased from 2018 to 2019. Compared to 2018, there was also a drop in section 203.3 self-

reports, an increase in section 203.6 self-reports, and a decrease in section 203.1 self-reports. Conversely, the share of referred matters relating to sections 203.4, 205.3 and 201.3 increased from 2018 to 2019. In comparison, the proportion of addressed self-reports for section 203.4 decreased, there was no change to the share of section 205.3 self-reports across years, and the share of section 201.3 self-reports increased in 2019.

Figure 4: ISO rules compliance matters addressed, self-reports versus AESO referrals



Of the 482 ISO rules related self-reports addressed in 2019, 92 were issued a notice of specified penalty; while 89 of the 111 matters referred by the AESO received a notice of specified penalty.

4. OPERATIONS AND PLANNING ALBERTA RELIABILITY STANDARDS

4.1. Enforcement

Reliability standards are developed by the NERC (NERC Standards) to promote the reliable operation of the bulk electric system. NERC Standards are grouped into 14 topical areas,⁹ such as: Transmission Operations, Resource and Demand Balancing, Communications, Emergency Preparedness and Operations, and CIP to name a few. The authority to approve NERC Standards rests with the Federal Energy Regulatory Commission (FERC) in the United States.

Since 2008, the AESO has endeavoured to adopt NERC Standards as ARS. Prior to applying to the AUC to adopt a NERC Standard, the AESO may modify the standard for relevance in

⁹ In Alberta, no Nuclear Standard has been adopted.

Alberta. If the NERC Standard is not relevant, the AESO may submit an application to the AUC recommending that the AUC not adopt but reject the NERC Standard.

As of the end of 2019, 73 ARS¹⁰ in total have been approved by the AUC and are in effect. The majority of the ARS are applicable to the AESO, while a smaller (but sometimes overlapping) set of ARS apply to market participants. Over the course of the year, the AUC received applications for new ARS and amendments to existing ARS. In 2019, 22 new and amended ARS became effective, 14 of which only apply to the AESO.

4.2. Monitoring and enforcement of market participants

The AESO is the compliance monitor with respect to market participants in Alberta and carries out its compliance monitoring mandate in accordance with ISO rules section 103.12 and its Compliance Monitoring Program (CMP) developed in consultation with stakeholders. The AESO's compliance monitoring activities, including scheduled reliability compliance audits, could result in a referral to the MSA, if non-compliance with an applicable ARS is suspected. Market participants can self-report suspected non-compliance directly to the MSA.

4.3. Monitoring and enforcement of the AESO

The MSA has oversight responsibilities for compliance of market participants, as well as the AESO. In respect of the AESO, the MSA is assisted by the WECC¹¹ by way of a services agreement between the MSA and WECC. As noted above, the bulk of ARS in place in Alberta are applicable to the AESO given the scope of its responsibilities and, consequently, its mandate to maintain system stability and reliability.

Just as the AESO monitors market participants in accordance with the CMP, the MSA and WECC use the CMP as a guide to monitor the AESO. WECC also tries to maintain consistency, where possible, with the program it applies to U.S. entities it monitors. Each year the MSA works with WECC to develop a plan to monitor the AESO. The plan confirms the scope of compliance monitoring including any intended deviations from the CMP.

4.4. Activity levels

The MSA addressed 16 O&P ARS matters in 2019 including 13 matters carried over from 2018. At the end of 2019, 58 O&P ARS matters remained under review.

Considering only O&P ARS, there was a decrease in the number of ARS matters addressed in 2019 compared to 2018. As noted above, one of the main reasons for this was that the MSA for 2019 prioritized addressing a backlog of CIP ARS matters. Also, the number of ARS matters varies from year-to-year due to the three-year audit cycle, given that a different group of market

¹⁰ MOD-010&012-AB-0 are treated as one standard.

¹¹ WECC is the regional entity responsible for assuring the reliability of the bulk electric system in the Western Interconnection.

participants are subject to a compliance audit. However, all market participants are subject to self-certification annually.

Figure 5: O&P ARS compliance matters addressed or unresolved¹²

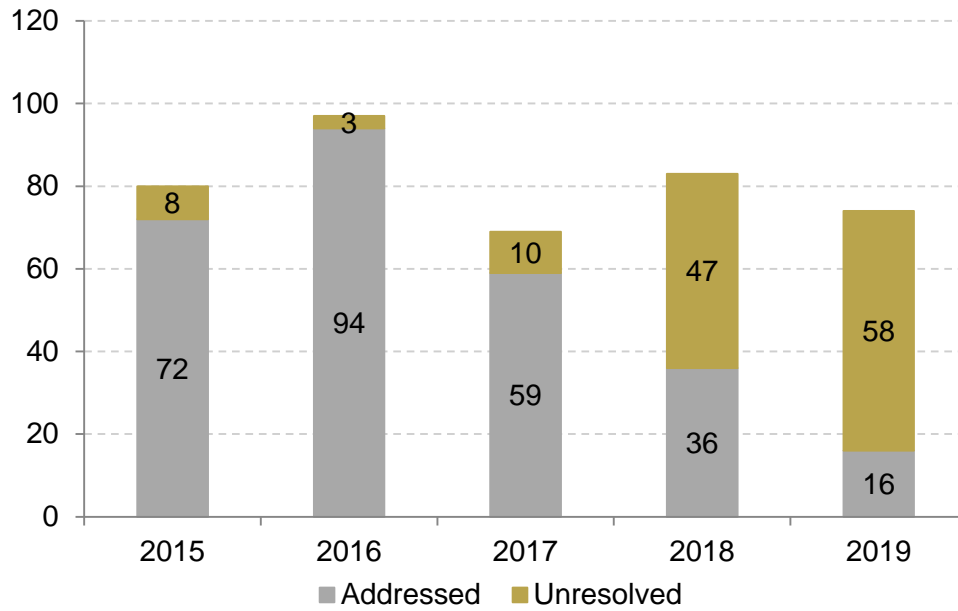
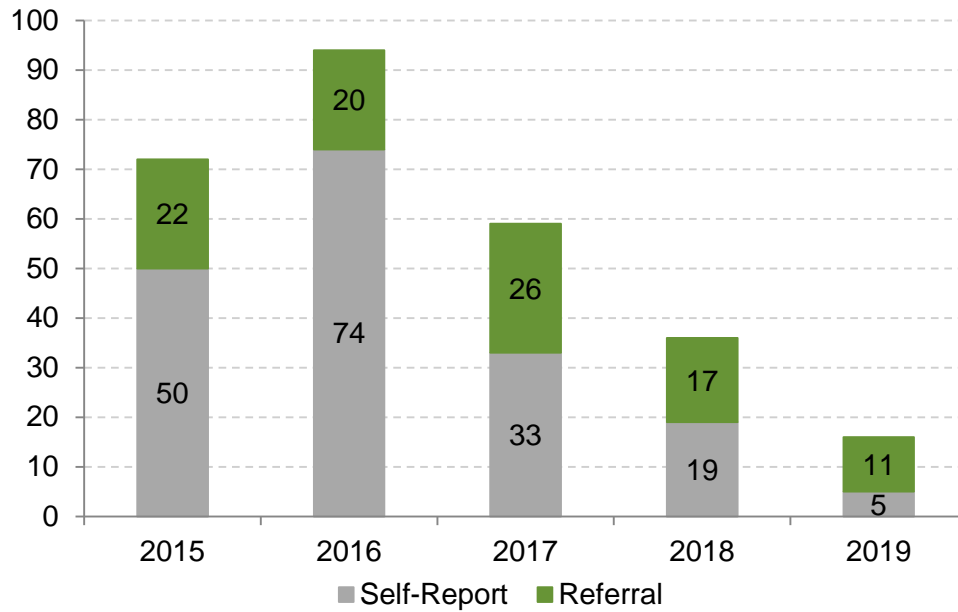


Figure 6: O&P ARS compliance matters addressed, self-reports and AESO referrals



¹² As unresolved matters are analyzed/reviewed, changes to this figure may occur.

Of the 16 closed matters in 2019, COM-001 resulted in five forbearance and penalty decisions. Of these five COM-001 decisions, three (60%) resulted in a forbearance outcome, and two (40%) resulted in a notice of specified penalty. In 2019, VAR-002 made up the majority of new files (excluding CIP files). However, the MSA opened more VAR-002 files in 2018 compared to 2019.

In 2019, six matters involving four standards were addressed with a notice of specified penalty, resulting in a total financial amount of \$50,000. In addition to the two COM-001 penalties, four of the 16 closed files resulted in a notice of specified penalty relating to standards FAC-003, PRC-001 and VAR-002.¹³ In 2018, seven matters involving two ARS were addressed with a notice of specified penalty, resulting in a total financial amount of \$22,750.

Table 2: Total specified penalties for O&P ARS addressed (Number of penalties in parentheses)¹⁴

Market Participant	COM-001	FAC-003	PRC-001	VAR-002	Total
ATCO Electric Ltd.		\$37,500			\$37,500 (2)*
ENMAX Energy Corporation				\$5,000	\$5,000 (1)
Imperial Oil Resources Limited	\$1,500				\$1,500 (1)
Pembina NGL Corporation			\$3,750		\$3,750 (1)
Western Sustainable Power Inc.	\$2,250				\$2,250 (1)
Total	\$3,750	\$37,500	\$3,750	\$5,000	\$50,000 (6)

*AUC Rule 027 specifies a larger penalty amount for contraventions of FAC-003.

The ARS listed in Table 2 fall into the following categories:

- COM Communications
- FAC Facilities Design, Connections, and Maintenance
- PRC Protection and Control
- VAR Voltage and Reactive

¹³ An additional four of the 16 matters were expired or withdrawn (EOP-001, PRC-001 and VAR-501). Unresolved matters include standards BAL-005, COM-001, COM-002, EOP-001, EOP-005, INT-009, PRC-001, PRC-018, PRC-023, VAR-002 and VAR-501.

¹⁴ This table only includes matters that were closed between January 1, 2019 and December 31, 2019. A published specified penalty will not appear in this table until the file is closed (mitigation must be completed to be considered closed).

REFERENCES

Legislation

Alberta Utilities Commission Act

http://www.qp.alberta.ca/1266.cfm?page=A37P2.cfm&leg_type=Acts&isbncln=9780779785322

Electric Utilities Act

http://www.qp.alberta.ca/1266.cfm?page=E05P1.cfm&leg_type=Acts&isbncln=9780779813551

Hydro and Electric Energy Act

http://www.qp.alberta.ca/1266.cfm?page=H16.cfm&leg_type=Acts&isbncln=9780779814848

Transmission Regulation

http://www.qp.alberta.ca/1266.cfm?page=2007_086.cfm&leg_type=Regs&isbncln=9780779782314

Alberta Utilities Commission

AUC Rules

<http://www.auc.ab.ca/Pages/Rules/rules-home.aspx>

Alberta Electric System Operator

Alberta Reliability Standards

<https://www.aeso.ca/rules-standards-and-tariff/alberta-reliability-standards/>

Compliance Monitoring Program

<https://www.aeso.ca/assets/Uploads/ARS-CMP-Final-v1.1.pdf>

ISO Rules

<https://www.aeso.ca/rules-standards-and-tariff/iso-rules/>

Self-Certification Guide

<https://www.aeso.ca/assets/Uploads/ARS-Self-Certification-Guide3.pdf>

Market Surveillance Administrator

MSA Compliance Process

<https://static1.squarespace.com/static/5d88e3016c6a183b1bcc861f/t/5d925a2f2c819d1bf2e09163/1569872432306/2016-10-19+Compliance+Process.pdf>

MSA WECC Services Agreement

<https://resources.albertamsa.ca/index.php?page=notice-re-msa-wecc-services-agreement---monitoring---reliability-standards-compliance>

MSA Interim Compliance Report

<https://static1.squarespace.com/static/5d88e3016c6a183b1bcc861f/t/5df7a663841e970bc2497c2c/1576511077311/Interim+Compliance+Report.pdf>

APPENDIX A: DATA SUPPLEMENT*Table A1: ISO rules compliance outcomes in 2019*

Section of ISO Rules	Forbearance	Notice of Specified Penalty	Compliance Exception	No Breach	Rejected	Withdrawn	Unresolved	Total
103.1	1						1	2
201.1							1	1
201.3	7	5						12
201.7	26	20		15		4	1	66
203.1		1		2			1	4
203.3	72	25		1	1		18	117
203.4	69	36	19	12	1		15	152
203.6	30	13		5			2	50
205.2	1							1
205.3	17	12					5	34
205.4	37			1			3	41
205.5	25	14	1	1			4	45
205.6	20	29		1				50
205.8	3	2		2				7
303.1	1	12						13
304.9	5						10	15
306.4	7	3					2	12
306.5	8	5					4	17
306.7							1	1
502.1		1						1
502.3	1							1
502.4		3						3
502.5	3							3
502.6	6						1	7
502.8	1							1
502.15	1							1
505.4	4							4
9.1.3	1							1
Total	346	181	20	40	2	4	69	662

Table A2: Specified penalties issued between January 1, 2019 and December 31, 2019 for contraventions of ISO rules

Market Participant	Summed Specified Penalty Amounts by Section of ISO Rules (\$)															Total (\$)	
	201.3	201.7	203.1	203.3	203.4	203.6	205.3	205.5	205.6	205.8	303.1	306.4	306.5	502.1	502.4		
Air Liquide Canada Inc.	500				1,500		500	750									3,250
Alberta Newsprint Company		500		1,500	22,500												24,500
Alberta Pacific Forest Industries Inc.				2,000	750												2,750
AltaGas Ltd.							1,000										1,000
ATCO Electric Ltd.												250					250
ATCO Power (2010) Ltd.					750												750
ATCO Power Canada Ltd.							500										500
Balancing Pool				1,500	4,250			1,500									7,250
Bitfury Technology Inc.										1,750							1,750
BowArk Energy Ltd.							500			1,000							1,500
Calgary Energy Centre No. 2 Inc.				750	1,500												2,250
Campus Energy Partners LP							500										500
Canadian Natural Upgrading Limited										250							250
Capital Power L.P.																500	500
Cenovus Energy Inc.					1,500								250				1,750
City of Medicine Hat				2,250	2,500								1,250				6,000
CP Energy Marketing L.P.						2,000											2,000
Daishowa-Marubeni International Ltd.								1,500									1,500
Enel X Canada Ltd.									1,750								1,750
EnerNOC Ltd.											48,500						48,500
ENMAX Cavalier LP				750													750
ENMAX Energy Corporation														250			250
ENMAX Generation Portfolio Inc.				1,500													1,500
ENMAX Power Corporation												250					250
Enmax Shepard Services Inc.				750													750
Genalta GP II Ltd.					1,500												1,500

Table A2: Specified penalties issued between January 1, 2019 and December 31, 2019 for contraventions of ISO (continued)

Market Participant	Summed Specified Penalty Amounts by Section of ISO Rules (\$)															Total (\$)
	201.3	201.7	203.1	203.3	203.4	203.6	205.3	205.5	205.6	205.8	303.1	306.4	306.5	502.1	502.4	
Grande Prairie Generation Inc.		250					1,250									1,500
International Paper Canada Pulp Holdings ULC		7,000		1,500	1,500											10,000
Irrigation Canal Power Co-op Ltd.				750	2,750											3,500
MAG Energy Solutions Inc.	500			1,500		1,500										3,500
Mercer Peace River Pulp Ltd.				1,500	1,500		500	1,500								5,000
Millar Western Forest Products Ltd.									3,500							3,500
Milner Power Limited Partnership by its General Partner Milner Power Inc.				7,250	3,000										250	10,500
Morgan Stanley Capital Group Inc.						60,000										60,000
NAT-1 Limited Partnership					2,250											2,250
Northstone Power Corp.		2,000			7,500					250						9,750
NRGreen Power Limited Partnership					4,000											4,000
Oldman 2 Wind Farm Limited		1,250		1,500	1,500											4,250
Powerex Corp.		250														250
Repsol Canada Energy Partnership		500														500
Shell Energy North America (Canada) Inc.						750										750
Signalta Resources Limited				750			1,000									1,750
Suncor Energy Inc.		250														250
Syncrude Canada Ltd.					1,500							250	250			2,000
TransAlta Corporation		2,500														2,500
TransAlta Generation Partnership				1,500	3,500			4,750	7,500							17,250
TransCanada Energy Ltd.				750						1,000						1,750
TransCanada Energy Sales Ltd.						4,500										4,500
Voltus Energy Canada Ltd.	1,250	1,000					500		37,250							40,000
West Fraser Mills Ltd.		16,500	500	4,000	750											21,750
Whitecourt Power Ltd.					1,500											1,500
Total	2,250	32,000	500	32,000	68,000	68,750	6,250	10,000	53,250	1,000	48,500	750	1,750	250	750	326,000

Table A3: O&P ARS compliance outcomes in 2019

Alberta Reliability Standard	Forbearance	Notice of Specified Penalty	Withdrawn	Expired	Unresolved	Total
BAL-005					3	3
COM-001	3	2			5	10
COM-002					2	2
EOP-001				1	1	2
EOP-005					3	3
FAC-003	2	2				4
INT-009					2	2
PRC-001		1		1	10	12
PRC-018					1	1
PRC-023	1				3	4
VAR-002		1			23	24
VAR-501			1	1	5	7
Total	6	6	1	3	58	74

The ARS listed in Table A3 fall into the following categories:

BAL Resource and Demand Balancing
 COM Communications
 EOP Emergency Preparedness and Operations
 FAC Facilities Design, Connections, and Maintenance
 INT Interchange Scheduling and Coordination
 PRC Protection and Control
 VAR Voltage and Reactive