



MARKET
SURVEILLANCE
ADMINISTRATOR

Enforcement Activities: Q1 2025

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

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1 ISO RULES COMPLIANCE

The ISO rules promote orderly and predictable actions by market participants and facilitate the operation of the Alberta Interconnected Electric System (AIES). The MSA enforces the ISO rules and endeavours to promote a culture of compliance and accountability among market participants, thereby contributing to the reliability and competitiveness of the Alberta electric system. If the MSA is satisfied a contravention has occurred and determines that a notice of specified penalty (NSP) is appropriate, then AUC Rule 019 guides the MSA on how to issue an NSP.

From January 1 to March 31, 2025, the MSA closed 253 ISO rules compliance matters, as reported in Table 1. An additional 179 matters were carried forward to the next quarter. During this period 41 matters were addressed with NSPs, totalling \$61,000 in financial penalties, with details provided in Table 2.

Table 1: ISO rules compliance outcomes from January 1 to March 31, 2025

ISO rule	Forbearance	Notice of specified penalty	No contravention
201.1	2	-	-
201.3	-	1	-
201.7	23	3	-
201.10	10	4	-
202.4	1	-	-
203.1	1	-	-
203.3	44	8	-
203.4	44	10	1
203.6	7	4	1
205.3	2	-	-
205.4	3	-	-
205.5	5	-	-
205.6	6	-	-
205.9	1	2	-
206.1	1	-	-
301.2	3	3	2
302.1	1	-	2
304.3	1	-	-
304.7	1	-	-
304.9	2	-	1
306.4	10	1	1
306.5	3	-	-
502.6	3	1	2
502.8	6	3	-
502.9	1	-	-
502.16	1	-	-
503.2	1	-	-
503.4	1	-	-
503.6	2	-	-
503.16	4	-	1
503.19	2	-	-
503.20	4	-	-
504.5	1	-	-
505.3	-	1	-
505.4	3	-	1
Total	200	41	12

Table 2: Specified penalties issues between January 1 and March 31, 2025 for contraventions of the ISO rules

Market participant	Total specified penalty amounts by ISO rule (\$)												Total (\$)	Matters	
	201.3	201.7	201.10	203.3	203.4	203.6	205.9	301.2	306.4	502.6	502.8	505.3			
Acciona Wind Energy Canada Inc.			1,000											1,000	2
Air Liquide Canada Inc.				27,000										27,000	1
Alberta Pacific Forest Industries Inc.					1,500									1,500	2
ATCO Electric Ltd.									250					250	1
BER Hand Hills wind LP								500						500	1
BHE Canada Rattlesnake L.P.					500									500	1
Canadian Hydro Developers, Inc.											1,500			1,500	1
Capital Power (Whitla) L.P.					250									250	1
Castle Rock Ridge LP				1,500										1,500	1
CP Energy Marketing L.P.						500								500	2
Cypress 2 Renewable Energy Centre Limited Partnership				500										500	1
Cypress Renewable Energy Centre Limited Partnership		10,000		500										10,500	2
EDF Renewables Development Inc.			500	250										750	2
EDP RENEWABLES SH PROJECT LIMITED PARTNERSHIP		500												500	1
Enfinite Corporation							500							500	2
ENMAX Energy Marketing Inc.				250										250	1
Fengate Central Utilities Block GP Inc.	250													250	1
Forty Mile Granlea Wind GP Inc.					5,000									5,000	1
Ghost Pine Windfarm, LP			500											500	1
Hays Solar LP					250									250	1
Imperial Oil Limited		500												500	1
International Paper Canada Pulp Holdings ULC				500										500	1
Jenner 1 Limited Partnership				250										250	1
Lanfine Wind 1 LP								500						500	1
Northstone Power Corp.					500									500	2
Oldman 2 Wind Farm Limited					250						1,500			1,750	2
Paintearth Wind Project Limited Partnership								1,500						1,500	1
Pincher Creek Limited Partnership											500			500	1
Powerex Corp.						250								250	1
Shell Energy North America (Canada) Inc.						250								250	1
TA Alberta Hydro LP										500		250		750	2
Whitla 2 Wind Generation L.P.					250									250	1
Total	250	11,000	2,000	30,750	8,500	1,000	500	2,500	250	500	3,500	250	61,000	41	

The ISO rules listed in Table 1 and Table 2 fall into the following categories:

- 103 Administration
- 201 General (Markets)
- 202 Dispatching the Markets
- 203 Energy Market
- 205 Ancillary Services Market
- 206 Interm Market Power Mitigation
- 301 General (System Reliability and Operations)
- 302 Transmission Constraint Management
- 304 Routine Operations
- 306 Outages and Disturbances
- 502 Technical Requirements
- 503 Technical and Operating Requirements
- 504 Legal Owners of Transmission Facilities and Load Facilities
- 505 Legal Owners of Generating Facilities

2 ARS COMPLIANCE

The MSA assesses market participant compliance with Alberta Reliability Standards (ARS) and issues NSPs where appropriate.

The ARS ensure the various entities involved in grid operation have practices in place, including procedures, communications, coordination, training, and maintenance to support the reliability of the AIES. ARS apply to both market participants and the AESO. ARS are divided into two categories: Operations and Planning (O&P) and Critical Infrastructure Protection (CIP). The MSA's approach to compliance with ARS focuses on promoting awareness of obligations and a proactive compliance stance. The MSA's process, in conjunction with AUC rules, provides incentives for robust internal compliance programs, and self-reporting.

In accordance with AUC Rule 027, NSPs for CIP ARS contraventions are not made public, as well as any information related to the nonpayment or dispute of a CIP ARS NSP. CIP matters often deal with cyber security issues and there is concern that granular public reporting may itself create a security risk. As such, the MSA only reports aggregated statistics regarding CIP ARS outcomes.

From January 1 to March 31, 2025, the MSA addressed 38 O&P ARS compliance matters (Table 3). 39 O&P ARS matters were carried forward to the quarter. During this period, 13 matters were addressed with NSPs, totalling \$19,500 in financial penalties (Table 4). For the same period, the MSA addressed 60 CIP ARS compliance matters, as reported in Table 5, and 14 matters were addressed with NSPs, totalling \$17,750 in financial penalties. 127 CIP ARS matters were carried forward to next quarter.

Table 3 O&P ARS compliance outcomes from January 1 to March 31, 2025

Reliability standard	Forbearance	Notice of specified penalty	Total
COM-001	4	1	5
COM-002	-	3	3
EOP-005	1	-	1
EOP-008	-	1	1
FAC-008	2	3	5
PRC-001	1	3	4
PRC-002	2	-	2
PRC-004	-	1	1
PRC-005	4	1	5
PRC-025	7	-	7
VAR-002	3	-	3
VAR-501	1	-	1
Total	25	13	38

Table 4: Specified penalties issued between January 1 and March 31, 2025 for contraventions of O&P ARS

Market participant	Total specified penalty amounts by ARS (\$)							Total (\$)	Matters
	COM-001	COM-002	EOP-008	FAC-008	PRC-001	PRC-004	PRC-005		
AltaLink L.P., by its general partner, AltaLink Management Ltd.				1,500				1500	1
BHE Canada Rattlesnake L.P.							2,500	2500	1
City of Medicine Hat		2,500			2,500	2,500		7500	3
ENMAX Power Corporation	2,500							2500	1
Enmax Power Corporation			1,500					1500	1
Garden Plain I LP				1,500				1500	1
TA Alberta Hydro LP				2,500				2500	1
Total	2,500	2,500	1,500	5,500	2,500	2,500	2,500	19,500	9

The ARS outcomes listed in Table 3 and Table 4 are contained within the following categories:

- COM Communications
- EOP Emergency Preparedness and Operations
- FAC Facilities Design, Connections, and Maintenance
- IRO Interconnection Reliability Operations and Coordination
- PRC Protection and Control
- VAR Voltage and Reactive

Table 5: CIP ARS compliance outcomes from January 1 to March 31, 2025

Reliability standard	Forbearance	Notice of specified penalty	Withdrawn	Total
CIP-002	-	2	-	2
CIP-003	4	1	1	6
CIP-004	9	-	-	9
CIP-006	4	1	-	7
CIP-007	15	5	-	20
CIP-010	8	2	-	10
CIP-011	3	-	-	3
CIP-012	-	3	-	3
Total	43	14	1	60

The ARS outcomes listed in Table 5 are contained within the following categories:

CIP-002 BES Cyber System Categorization

CIP-003 Security Measurement Controls

CIP-004 Personnel & Training

CIP-005 Electronic Security Perimeter(s)

CIP-006 Physical Security of BES Cyber Systems

CIP-007 System Security Management

CIP-010 Configuration Change Management and Vulnerability Assessments

CIP-011 Information Protection

CIP-012 Communications between Control Centres