

NOTICE OF SPECIFIED PENALTY

Date of Issue: December 17, 2018		Payment Due Date: January 16, 2019	
MSA File Number	2018-343	Specified Penalty Amount	\$10,000
Registered Entity Name	Morgan Stanley Capital Group Inc.		
Asset ID (if applicable)	MOMT	Self-Report	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
ISO Rule	203.6	Date of Contravention	April 29, 2018
Date of Referral/Self Report	August 15, 2018	This is the seventh contravention by this asset and the eighth contravention by this market participant for this rule within a rolling 12 month period.	

EVENT DETAILS

On April 29, 2018 at approximately 01:43, an offer was restated for asset MOMT from 300 MW to 254 MW to import in the hour ending (HE) 03 settlement interval on the same day. The associated e-tags for this settlement interval were curtailed to 221 MW at approximately 01:47. However, no corresponding restatement was submitted to revise the import offer for HE 03.

On April 29, 2018 at approximately 02:47, the associated e-tags for the HE 04 settlement interval on the same day were curtailed to 206 MW. At approximately 02:50, an offer was restated for asset MOMT from 300 MW to 254 MW to import in the HE 04 settlement interval. However, no subsequent restatement was submitted to revise the import offer for HE 04 in order to reflect the curtailment.

On April 29, 2018 at approximately 03:39, an offer was restated for asset MOMT from 300 MW to 254 MW to import in the HE 05 settlement interval on the same day. The associated e-tags for this settlement interval were curtailed to 177 MW at approximately 03:47. However, no corresponding restatement was submitted to revise the import offer for HE 05.

On April 29, 2018 at approximately 04:43, an offer was restated for asset MOMT from 300 MW to 254 MW to import in the HE 06 settlement interval on the same day. The associated e-tags for this settlement interval were curtailed to 193 MW at approximately 04:47. However, no corresponding restatement was submitted to revise the import offer for HE 06.

On April 29, 2018 at approximately 05:41, an offer was restated for asset MOMT from 300 MW to 254 MW to import in the HE 07 settlement interval on the same day. The associated e-tags for this settlement interval were curtailed to 163 MW at approximately 05:48. However, no corresponding restatement was submitted to revise the import offer for HE 07.

On April 29, 2018 at approximately 06:48, an offer was restated for asset MOMT from 300 MW to 254 MW to import in the HE 08 settlement interval on the same day. The associated e-tags for this settlement interval were curtailed to 194 MW at approximately 06:47 and 06:48. However, no corresponding restatement was submitted to revise the import offer for HE 08.

Subsection 6(4) of section 203.6 of the ISO rules states:

If:

- (a) the pool participant is unable to procure transmission service, or the transmission service is curtailed by any transmission service provider or the ISO, as referenced under subsection 5(3); or
- (b) there is any other change in the available capability for the sink asset or the source asset, as applicable;

then the pool participant must submit, as applicable:

- (i) an energy restatement in accordance with either subsection 3.5.3.2 or subsection 3.5.4.2 of the ISO rules, Mandatory Energy Restatements; or
- (ii) an ancillary services restatement in accordance with subsection 3.6.3 of the ISO rules, Restatements.

FINDINGS

Based upon the information obtained by the MSA, the MSA is satisfied that the event was a contravention of ISO rule 203.6.

MATERIAL FACTS

The material facts relied upon by the MSA include the following:

1. E-tag data and AESO import offer data for MOMT for April 29, 2018.
2. AESO information request issued to Morgan Stanley Capital Group Inc. dated July 3, 2018.
3. Morgan Stanley Capital Group Inc.'s response to the AESO information request dated July 23, 2018.
4. Referral from the AESO to the MSA dated August 15, 2018.
5. Additional information provided by Morgan Stanley Capital Group Inc. to the MSA dated August 20, 2018.

DELIVERY OF PAYMENT

Payment by cheque or certified funds is to be made out to the "General Revenue Fund c/o Minister of Finance", and delivered to the Alberta Utilities Commission (AUC) at: 1400, 600 – 3rd Avenue S.W., Calgary, Alberta, T2P 0G5. Questions in respect of delivery of payment should be directed to the AUC. The payment should reference this notice and related MSA File #. Delivery of payment should also be confirmed by email to compliance@albertamsa.ca, with copy to the following AUC personnel: Jeremy Smith (Financial Accountant) Jeremy.Smith@auc.ab.ca, and Greg Andrews (Investigator) Greg.Andrews@auc.ab.ca.

NOTICE

The Market Surveillance Administrator (MSA) is granted the power and authority under s. 52 of the *Alberta Utilities Commission Act* to issue a Notice of Specified Penalty where the MSA is satisfied that a person has contravened an ISO rule. Specified penalties are set out in AUC Rule 019.

In accordance with the relevant enactments and rules, a dispute regarding the issuance of a Notice of Specified Penalty or failure to pay the specified penalty in accordance with this notice will result in a hearing or other proceeding before the AUC.

In accordance with s. 5(1) of AUC Rule 019 this Notice of Specified Penalty will be made public no earlier than receipt of confirmation of payment from the Commission and no later than 45 days after issuance. The MSA will, if applicable, also post on its website the link to any decision of the AUC respecting the specified penalty.

If your organization disputes the issuance of this Notice of Specified Penalty, or if you have any other questions or comments regarding this matter, please contact the MSA compliance team at compliance@albertamsa.ca.

SIGNATURE

Signature	"Original Signed"	Signature Date	December 17, 2018
Name	Doug Doll	Title	Director, Corporate Services and Compliance