

NOTICE OF SPECIFIED PENALTY

Date of Issue: February 26, 2025		Payment Due Date: March 26, 2025	
MSA File Number	2024-256 – Jan 5 2024	Specified Penalty Amount	\$500
Market Participant Name	Air Liquide Canada Inc.		
Asset ID (if applicable)	ALS1	Self-Report	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
ISO Rule Section	203.3	Date of Contravention	January 5, 2024
Date of Referral/Self Report	July 24, 2024	This is the first contravention by this asset for this section of the ISO rules within a rolling 12-month period.	

MSA FINDINGS

On January 5, 2024, at approximately 11:17, a MW offer restatement was submitted for the ALS1 asset within two hours of the start of the January 5, 2024, HE 13 settlement interval, redistributing the MW of the operating blocks. Information available to the MSA indicates that the requirements of section 203.3 of the ISO rules were not satisfied. Section 203.3 of the ISO rules states, in part:

- (1) A pool participant that submits an offer may submit a MW restatement prior to two (2) hours before the start of a settlement interval.
- (2) A pool participant that submits an offer must submit a MW restatement redistributing the MW to represent the operating state of the source asset, as soon as reasonably practicable, if the source asset cannot comply with the current offer as a result of:
- (a) either
- (i) an acceptable operational reason; or
 - (ii) an operational deviation and such restatement is required under subsection 5(3) of section 203.4 of the ISO rules, Delivery Requirements for Energy; and an available capability restatement under subsection 2 cannot reasonably accommodate the source asset's operating state; or
- (b) carrying out either one (1) or both of commissioning and testing under section 505.3 of the ISO rules, Coordinating Synchronization, Commissioning, WECC Testing and Ancillary Services Testing or under section 505.4 of the ISO rules, Coordinating Operational Testing.
- (3) A pool participant must submit the reason or reasons for submitting a MW restatement in accordance with subsection 4(2)(a) if such MW restatement is submitted within two (2) hours of the start of the settlement interval or within the current settlement interval.

[...]

The MSA is satisfied that the event was a contravention of section 203.3 of the ISO rules.

DELIVERY OF PAYMENT

Payment can be made by electronic funds transfer (EFT). Please reach out to compliance@albertamsa.ca for instructions. When submitting the EFT, please send an email to AU.FinOps@gov.ab.ca, compliance@albertamsa.ca and enforcement@auc.ab.ca noting the MSA file #, market participant name, name as appears on bank account, payment amount and the date of the payment. Questions can be directed to compliance@albertamsa.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.

APPROVED BY

Mark Nesbitt, Director, Enforcement on February 26, 2025

NOTICE OF SPECIFIED PENALTY

Date of Issue: February 26, 2025		Payment Due Date: March 26, 2025	
MSA File Number	2024-256 – Jan 16 2024	Specified Penalty Amount	\$1,500
Market Participant Name	Air Liquide Canada Inc.		
Asset ID (if applicable)	ALS1	Self-Report	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
ISO Rule Section	203.3	Date of Contravention	January 16, 2024
Date of Referral/Self Report	July 24, 2024	This is the second contravention by this asset for this section of the ISO rules within a rolling 12-month period.	

MSA FINDINGS

On January 16, 2024, at approximately 7:03, a MW offer restatement was submitted for the ALS1 asset within two hours of the start of the January 16, 2024, HE 10 settlement interval, redistributing the MW of the operating blocks. Information available to the MSA indicates that the requirements of section 203.3 of the ISO rules were not satisfied. Section 203.3 of the ISO rules states, in part:

- 4(1) A pool participant that submits an offer may submit a MW restatement prior to two (2) hours before the start of a settlement interval.
- (2) A pool participant that submits an offer must submit a MW restatement redistributing the MW to represent the operating state of the source asset, as soon as reasonably practicable, if the source asset cannot comply with the current offer as a result of:
- (a) either
- (i) an acceptable operational reason; or
 - (ii) an operational deviation and such restatement is required under subsection 5(3) of section 203.4 of the ISO rules, Delivery Requirements for Energy; and an available capability restatement under subsection 2 cannot reasonably accommodate the source asset's operating state; or
- (b) carrying out either one (1) or both of commissioning and testing under section 505.3 of the ISO rules, Coordinating Synchronization, Commissioning, WECC Testing and Ancillary Services Testing or under section 505.4 of the ISO rules, Coordinating Operational Testing.
- (3) A pool participant must submit the reason or reasons for submitting a MW restatement in accordance with subsection 4(2)(a) if such MW restatement is submitted within two (2) hours of the start of the settlement interval or within the current settlement interval.

[...]

The MSA is satisfied that the event was a contravention of section 203.3 of the ISO rules.

DELIVERY OF PAYMENT

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Mark Nesbitt, Director, Enforcement on February 26, 2025

NOTICE OF SPECIFIED PENALTY

Date of Issue: February 26, 2025		Payment Due Date: March 26, 2025	
MSA File Number	2024-256 – Mar 20 2024	Specified Penalty Amount	\$5,000
Market Participant Name	Air Liquide Canada Inc.		
Asset ID (if applicable)	ALS1	Self-Report	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
ISO Rule Section	203.3	Date of Contravention	March 20, 2024
Date of Referral/Self Report	July 24, 2024	This is the third contravention by this asset for this section of the ISO rules within a rolling 12-month period.	

MSA FINDINGS

On March 20, 2024, at approximately 02:27, a MW offer restatement was submitted for the ALS1 asset within two hours of the start of the March 20, 2024, HE 03 settlement interval, redistributing the MW of the operating blocks. Information available to the MSA indicates that the requirements of section 203.3 of the ISO rules were not satisfied. Section 203.3 of the ISO rules states, in part:

4(1) A pool participant that submits an offer may submit a MW restatement prior to two (2) hours before the start of a settlement interval.

(2) A pool participant that submits an offer must submit a MW restatement redistributing the MW to represent the operating state of the source asset, as soon as reasonably practicable, if the source asset cannot comply with the current offer as a result of:

(a) either

(i) an acceptable operational reason; or

(ii) an operational deviation and such restatement is required under subsection 5(3) of section 203.4 of the ISO rules, Delivery Requirements for Energy;

and an available capability restatement under subsection 2 cannot reasonably accommodate the source asset's operating state; or

(b) carrying out either one (1) or both of commissioning and testing under section 505.3 of the ISO rules, Coordinating Synchronization, Commissioning, WECC Testing and Ancillary Services Testing or under section 505.4 of the ISO rules, Coordinating Operational Testing.

(3) A pool participant must submit the reason or reasons for submitting a MW restatement in accordance with subsection 4(2)(a) if such MW restatement is submitted within two (2) hours of the start of the settlement interval or within the current settlement interval.

[...]

The MSA is satisfied that the event was a contravention of section 203.3 of the ISO rules.

DELIVERY OF PAYMENT

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Mark Nesbitt, Director, Enforcement on February 26, 2025

NOTICE OF SPECIFIED PENALTY

Date of Issue: February 26, 2025		Payment Due Date: March 26, 2025	
MSA File Number	2024-256 – Mar 27 2024	Specified Penalty Amount	\$10,000
Market Participant Name	Air Liquide Canada Inc.		
Asset ID (if applicable)	ALS1	Self-Report	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
ISO Rule Section	203.3	Date of Contravention	March 27, 2024
Date of Referral/Self Report	July 24, 2024	This is the fourth contravention by this asset for this section of the ISO rules within a rolling 12-month period.	

MSA FINDINGS

On March 27, 2024, at approximately 07:38, a MW offer restatement was submitted for the ALS1 asset within two hours of the start of the March 27, 2024, HE 10 settlement interval, redistributing the MW of the operating blocks. Information available to the MSA indicates that the requirements of section 203.3 of the ISO rules were not satisfied. Section 203.3 of the ISO rules states, in part:

4(1) A pool participant that submits an offer may submit a MW restatement prior to two (2) hours before the start of a settlement interval.

(2) A pool participant that submits an offer must submit a MW restatement redistributing the MW to represent the operating state of the source asset, as soon as reasonably practicable, if the source asset cannot comply with the current offer as a result of:

(a) either

(i) an acceptable operational reason; or

(ii) an operational deviation and such restatement is required under subsection 5(3) of section 203.4 of the ISO rules, Delivery Requirements for Energy;

and an available capability restatement under subsection 2 cannot reasonably accommodate the source asset's operating state; or

(b) carrying out either one (1) or both of commissioning and testing under section 505.3 of the ISO rules, Coordinating Synchronization, Commissioning, WECC Testing and Ancillary Services Testing or under section 505.4 of the ISO rules, Coordinating Operational Testing.

(3) A pool participant must submit the reason or reasons for submitting a MW restatement in accordance with subsection 4(2)(a) if such MW restatement is submitted within two (2) hours of the start of the settlement interval or within the current settlement interval.

[...]

The MSA is satisfied that the event was a contravention of section 203.3 of the ISO rules.

DELIVERY OF PAYMENT

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NOTICE OF SPECIFIED PENALTY

Date of Issue: February 26, 2025		Payment Due Date: March 26, 2025	
MSA File Number	2024-256 – Apr 7 2024	Specified Penalty Amount	\$10,000
Market Participant Name	Air Liquide Canada Inc.		
Asset ID (if applicable)	ALS1	Self-Report	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
ISO Rule Section	203.3	Date of Contravention	April 7, 2024
Date of Referral/Self Report	July 24, 2024	This is the fifth contravention by this asset for this section of the ISO rules within a rolling 12-month period.	

MSA FINDINGS

On April 7, 2024, at approximately 02:11, a MW offer restatement was submitted for the ALS1 asset within two hours of the start of the April 7, 2024, HE 03 settlement interval, redistributing the MW of the operating blocks. Information available to the MSA indicates that the requirements of section 203.3 of the ISO rules were not satisfied. Section 203.3 of the ISO rules states, in part:

4(1) A pool participant that submits an offer may submit a MW restatement prior to two (2) hours before the start of a settlement interval.

(2) A pool participant that submits an offer must submit a MW restatement redistributing the MW to represent the operating state of the source asset, as soon as reasonably practicable, if the source asset cannot comply with the current offer as a result of:

(a) either

(i) an acceptable operational reason; or

(ii) an operational deviation and such restatement is required under subsection 5(3) of section 203.4 of the ISO rules, Delivery Requirements for Energy;

and an available capability restatement under subsection 2 cannot reasonably accommodate the source asset's operating state; or

(b) carrying out either one (1) or both of commissioning and testing under section 505.3 of the ISO rules, Coordinating Synchronization, Commissioning, WECC Testing and Ancillary Services Testing or under section 505.4 of the ISO rules, Coordinating Operational Testing.

(3) A pool participant must submit the reason or reasons for submitting a MW restatement in accordance with subsection 4(2)(a) if such MW restatement is submitted within two (2) hours of the start of the settlement interval or within the current settlement interval.

[...]

The MSA is satisfied that the event was a contravention of section 203.3 of the ISO rules.

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