

NOTICE OF SPECIFIED PENALTY

Date of Issue: September 17, 2025		Payment Due Date: October 17, 2025	
MSA File Number	2025-197	Specified Penalty Amount	\$500
Market Participant Name	Subra Limited Partnership		
Asset ID (if applicable)	FCS1	Self-Report	☐ YES ☒ NO
ISO Rule Section	503.16	Date of Contravention	October 23, 2024
Date of Referral/Self Report	May 15, 2025	This is the first contravention by this asset for this section of the ISO rules within a rolling 12-month period.	

MSA FINDINGS

Information available to the MSA indicates that between October 23, 2024, and March 2, 2025, the FCS1 asset stopped reporting regular potential real power values. Section 503.16 – SCADA of the ISO rules states, in part:

2 (2) The legal owner of an aggregated facility containing a wind or solar resource must meet the supervisory control and data requirements set out in Appendix 2.

[...]

5 (1) A legal owner must implement the communication methods for supervisory control and data acquisition data between its facility and the ISO in accordance with Table 3.

Appendix 2 states that the FCS1 asset must report potential real power capability. Table 3 further requires that the data availability is no less than 98.0%, or a maximum 175.2 hours of unavailability per year.

The MSA is satisfied that the conduct was a contravention of section 503.16 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

Derek Olmstead, Administrator and CEO, on September 12, 2025