NOTICE OF SPECIFIED PENALTY Date of Issue: November 18, 2015 Payment Due Date: December 18, 2015 RS2015-035 MSA File Number: Specified Penalty \$ 1,500 Amount: Registered Entity Name: Imperial Oil Resources Reliability Standard: COM-001-AB-1.1 Self Report ✓ YES П по Accepted Mitigation Plan: YES □ NO Requirement: R3 Date of Referral/Self Report: June 26, 2015 Date of Contravention: October 1, 2013 to March 31, 2015

EVENT DETAILS

Pursuant to the Alberta Electric System Operator (AESO) Alberta Reliability Standards 2015-2017 audit schedule, the AESO conducted a scheduled Q2/2015 compliance monitoring audit of Imperial Oil Resources. The applicable audit period with respect to COM-001-AB-1.1 extended from April 1, 2012 to March 31, 2015. Based upon AESO audit findings, COM-001-AB-1.1 was contravened as follows:

- From October 1, 2013 to March 31, 2015, there was insufficient evidence to demonstrate that alternate voice telecommunication facilities were managed and tested at its Mahkeses (IOR1) and Nabiye (IOR2) sites. R3 of the standard states:
 - **R3** The ISO and each operator of a transmission facility must manage and test its alternate voice and message telecommunication facilities.

MR3 Evidence of managing and testing its alternate voice and message telecommunication facilities as required in requirement R3 exists. Evidence may include:

- (a) a list identifying each telecommunication facility as determined to be alternate;
- (b) documented procedures describing how to manage and test its alternate telecommunication facilities; and
- (c) records of testing.

FINDINGS

Based upon the information obtained by the MSA, the MSA is satisfied that the event was a contravention of Reliability Standard COM-001-AB-1.1, requirement R3.

MATERIAL FACTS

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

- 1. Self-report from Imperial Oil Resources to the MSA dated June 26, 2015.
- AESO Alberta Reliability Standards Compliance Monitoring Audit Report dated October 20, 2015 based upon findings of the AESO Q2/2015 reliability compliance audit of Imperial Oil Resources.
- 3. Mitigation Plan from Imperial Oil Resources to the MSA dated November 17, 2015.

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: 4th Floor, 425 - 1st Street S.W., Calgary, Alberta, T2P 3L8. Questions in respect of delivery of payment should be addressed to the Director of Finance, 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: Sabi Ghavami (Director, Finance) sabi.ghavami@auc.ab.ca, and Andrew Davison (Senior Market Analyst) andrew.davison@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 a reliability standard. Specified penalties are set out in AUC Rule 027.

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 027 this Notice of Specified Penalty will be made public no earlier than 30 days 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.

NOTICE OF SPECIFIED PENALTY			
SIGNATURE			
Signature:	"Original Signed"	Signature Date:	November 18, 2015
Name:	Doug Doll	Title:	Director Corporate Services and Compliance