

NOTICE OF SPECIFIED PENALTY

Date of Issue: September 15, 2025		Payment Due Date: October 15, 2025	
MSA File Number	RS2025-120	Specified Penalty Amount	\$ 10,000
Market Participant Name	Imperial Oil Resources Ltd.		
Reliability Standard	COM-001-AB-3	Self-Report	☐ YES ☒ NO
Requirement	R9	Accepted Mitigation Plan	☐ YES ☒ NO
Date of Self Report	August 6, 2025	Date of Contravention	April 1, 2024

MSA FINDINGS

Requirement R9 of COM-001-AB-3 states:

R9 Each Responsible Entity shall test its backup voice communication capability, as specified in Appendix 1, Appendix 2, and Appendix 3, at least once each month. If the test is unsuccessful, the Responsible Entity shall initiate action to repair or designate a temporary replacement backup voice communication capability within 2 hours of the unsuccessful test.

The MSA is satisfied that Imperial Oil Resources Ltd. contravened requirement R9 of COM-001-AB-3 from April 1, 2024, to August 25, 2024, as the quarterly tests were not performed monthly.

The MSA determined this contravention to be a Severe severity level, as the contravention indicates that Imperial Oil Resources Ltd. failed to be compliant on the date the standard came into effect.

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 Alberta 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 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

Daniela Cismaru - Advisor, Reliability Standards, on September 11, 2025.