

NOTICE TO MARKET PARTICIPANTS AND STAKEHOLDERS

February 27, 2026

RE: Publication of Draft Investigation and Enforcement Process

On November 25, 2025, the MSA published a [Notice to Market Participants and Stakeholders](#) regarding the initiation of a stakeholder consultation on its enforcement processes, with the MSA seeking initial feedback on whether the consultation is necessary and on the initial scope assessment provided in the Notice. This initial feedback was due on January 16, 2026.

The MSA received feedback from nine parties which are published on the MSA website [here](#). The submissions provided comments on both the MSA's proposed scope and on additional scope items that should be considered in drafting a consolidated document. Based on the feedback received and further internal deliberations, the MSA has drafted a version of the integrated process document that is available at the following link:

[Draft Investigation and Enforcement Process \(IEP\)](#)

The two existing documents were consolidated by inserting sections from the Investigation Procedures into the Compliance Process and then merging, reordering, and rewriting sections. Given the integration and the scope of the changes, the MSA has not provided a blackline version.

The MSA has summarized the feedback received along with the initial assessment scope on tables attached to this notice. Scope recommendations have been grouped into four categories: those addressed in the draft document with a reference to the applicable section(s), those partially addressed in the draft document with a reference to the applicable section(s) and an explanation for the partial inclusion, those not addressed in the draft document with an explanation of the rejection, and those that the MSA considers beyond the scope of this initiative, but that will be considered by the MSA in other improvement initiatives.

The MSA welcomes stakeholder comments and suggestions related to the draft IEP by April 16, 2026, to stakeholderconsultation@albertamsa.ca. All submissions will be made public on the MSA's website shortly thereafter.

Technical meeting

The MSA will host an in-person technical meeting in Calgary on March 19, 2026, to discuss the draft IEP. For those unable to be present in Calgary, an online option will be available, with questions asked through a moderator. The proposed agenda for the technical meeting is below. To register for the meeting, please email stakeholderconsultation@albertamsa.ca by March 13, 2026.

Proposed agenda

Time	Activity
8:00 a.m.	Registration and light refreshments
8:20 a.m.	Welcome and introduction of MSA speakers
8:30 a.m.	Administrator's remarks
8:40 a.m.	Overview of structural changes (ss. 3, 5, 6.1.1, 6.1.6, 6.2, 6.3)
9:10 a.m.	Changes to matter sourcing and Issue Assessment (ss. 4 and 5)
9:40 a.m.	Break
10:00 a.m.	Changes to Investigation Process (s. 6)
10:45 a.m.	Changes to enforcement actions and forbearance (ss. 7 and 8)
11:30 a.m.	Open discussion
12:30 p.m.	End of technical meeting

The timeline for the remaining stages of the consultation is as follows:

Activity	Timeline
Technical meeting on draft IEP	March 19, 2026
Comments and suggestions related to draft IEP due	April 16, 2026
Publish revised IEP and MSA decision	June 5, 2026

If there are any questions about this process, please contact Nancy Bishay, Executive Director, External Engagement and Corporate Services, at nancy.bishay@albertamsa.ca.

Derek Olmstead
Administrator & CEO
Market Surveillance Administrator

Scope addressed in the draft document:

Scope item	Draft document section(s)
<p>MSA: The integration of the Compliance Process and the Investigation Procedures into one cohesive document that can scale appropriately between relatively straight-forward matters and more complex matters. In the integrated process, matters received from any source would be handled in a consistent investigation process with required notifications that provide clarity on the scope, process, and timelines. Following the investigation stage, enforcement would proceed according to the requirements specified in the <i>Alberta Utilities Commission Act</i>.</p> <p>ENMAX: Not all contraventions are equal with some being minor in nature and establishing criteria to help test and categorize the materiality of a potential contravention early on in the process is needed. This would further streamline the MSA’s practices and allow for a simpler mediation/resolution process for less serious contraventions where appropriate, keeping in line with initiatives to reduce red tape.</p> <p>ENMAX: Merging the Compliance Process and Investigation Procedures into a single cohesive document should not compromise transparency or create additional regulatory burden. ENMAX supports the development of a single comprehensive compliance and investigation process for MSA matters so long as the process continues to preserve transparency, clarity, and flexibility to differentiate between routine and complex matters.</p> <p>ENMAX: In the interest of regulatory efficiency, the document should acknowledge that compliance cannot be approached with a one-size-fits-all methodology. Routine and straightforward matters should not require the same level of rigor or procedural steps as more complex cases. Any consolidated document should incorporate a streamlined, less burdensome process for routine activities while maintaining appropriate rigor for more significant issues.</p>	
<p>MSA: The content to be included in self-reports, mitigation plans, and referrals.</p> <p>Capital Power: In terms of self-reports, while there may be benefit in identifying content, given the breadth of possible scenarios, it may be more effective to seek to define minimal prescriptive components alongside general guidance and considerations.</p> <p>ENMAX: The data requirements from the MSA, the contents of self-reports and mitigation plans, and the factors the MSA considers when determining incidents of penalties and whether to accept or reject mitigation plans are all influenced by the</p>	<p>s. 4.1.2 s. 4.1.4 s. 4.2.5</p>

<p>seriousness of the possible contravention. ENMAX plans to provide detailed feedback on these topics to highlight what is working well with the existing process, as well as suggested enhancements to help increase efficient outcomes for the MSA, AESO and stakeholders.</p>	
<p>MSA: The process for Alberta Reliability Standards enforcement with respect to the ARCMP and the AESO compliance audit process.</p> <p>ATCO: Clarification on the timeline for a self-report to be recognized by the MSA after the AESO’s compliance monitoring tool/process (e.g., self-certification) is initiated. Currently, the MSA’s Compliance Process document only speaks to the required timeline of self-reporting after a compliance audit has been initiated.</p>	s. 4.1.3
<p>MSA: Additional information on the factors that the MSA considers when determining whether to accept or reject a mitigation plan.</p> <p>Capital Power: Similar to comments provided under response #2, Market Participants and the MSA would greatly benefit from added clarity on the factors applied when accepting or rejecting a mitigation plan. In addition to reducing the number of interactions, a deeper understanding of the factors would increase understanding of expectations that could be applied to future mitigation plans, thereby decreasing the instances of rejections which result in burdensome follow up for the Market Participants and the MSA.</p>	s. 7.1.4
<p>MSA: Additional requirements for the submission of data and records requested in the course of MSA matters.</p>	s. 6.1.7(1)
<p>AESO: The ability of parties to understand the nature of the alleged conduct under investigation.</p>	s. 6.1.1 s. 6.1.2 s. 6.1.6 s. 6.3.4
<p>AESO: The ability for parties to discuss an investigation with the MSA for improved mutual understanding.</p> <p>TransAlta: TransAlta recommends that the MSA consider more face-to-face engagement when the Information Request (IR) process does not achieve shared understanding. Direct dialogue can expedite resolution of complex issues, reduce administrative burden, and strengthen collaborative relationships between the MSA and market participants. NERC and Regional Entities often employ outreach meetings and compliance workshops to clarify expectations and resolve ambiguities effectively. Face to face and collaborative meetings with market participants that include the AESO would also be productive to standardize methodology and practices for the submission of long lead time asset estimated parameters.</p>	s. 6.1.6

Scope partially addressed in the draft document:

Scope item	MSA response
<p>TransAlta: TransAlta recommends that the MSA create a streamlined self report (self-report log) for non-compliance issues that the market participant is not seeking forbearance but is reporting the event to the MSA in accordance with its effective compliance program. NERC has such a program outlined in its Rules of Procedure, Appendix 4C, Section 4.5A: Registered Entities found by the CEA to be eligible, after a formal review of internal controls, pursuant to procedures adopted by NERC and the Regional Entities and provided to Applicable Governmental Authorities, may be granted approval by the CEA to log noncompliance for subsequent review in lieu of submitting a Self-Report. The log shall be limited to noncompliance, posing a minimal risk to the reliability of the Bulk Power System unless otherwise authorized by an Applicable Governmental Authority. Approved Registered Entities shall maintain a log with a detailed description of the noncompliance, the risk assessment, and the Mitigating Activities completed or to be completed. There is a rebuttable presumption that noncompliance logged in this manner will be resolved as a Compliance Exception. The CEA will review the logs at least every three (3) months, with the possibility of extending the review period to six (6) months. The logs will be available for review, upon request, by NERC and Applicable Governmental Authorities.</p>	<p>As shown in the flow chart in section 3 and described in section 5, the revised process requires the MSA to consider whether a self-report or referral is frivolous, vexatious or trivial or otherwise does not warrant investigation which was not a step in the prior Compliance Process. This step, based on the information provided and prior to initiating an investigation, provides some of the efficiency gain that would be realized with the recommended self-report log.</p> <p>The MSA believes that a self-report log program with a rebuttable presumption is not consistent with the Alberta legislative regime and the equivalent FERC-approved structure relies on the NERC Violation Severity Levels to differentiate which self-reports are eligible to be handled via the log, which is not applicable in Alberta.</p>
<p>Capital Power: Capital Power agrees that the current process presents challenges worthy of consultation, including improved clarity of issues under consideration to better support the gathering of relevant data and records, and consideration for establishing reasonable timelines for response to Information Requests (IR). Often initial timelines are not proportionate to the scope and magnitude of the request. This results in diverting Market Participants' time towards dealing with extension requests rather than working towards fulfilling the IR, which in turn creates an avoidable draw on the MSA's resources.</p>	<p>The updates to the document partially address this in section 6.1.7 (1) that allows for discussions of response time concerns and extension requests as well as section 6.1.6 that allows for meetings during investigations which can help narrow the scope of information requests.</p> <p>The MSA retains discretion to set response deadlines.</p>

<p>Capital Power: Capital Power does not have any feedback with respect to the content included in referrals, however the referral process should ensure that market participants have visibility of any exchanges between the AESO and MSA related to a referral and an ability to challenge the conclusions or provide additional context to ensure equitable outcomes.</p> <p>Capital Power: Capital Power agrees with including consideration of the AESO compliance audit process to address current inefficiencies, particularly as it relates to the sharing of information between the agencies, including whether there is agreement (or not) with AESO findings, satisfaction with and completion of mitigation plans in response to audit findings, and alignment of risk ratings assigned to contraventions by each agency.</p> <p>TransAlta: TransAlta recommends that the MSA notify market participants whenever the AESO is engaged to provide input on mitigation plans. This transparency will help entities understand the scope of review and ensure alignment between the MSA, AESO, and the market participant in developing effective corrective actions. Clear communication of AESO involvement will also promote confidence in the process and reduce potential misunderstandings.</p>	<p>The updates to section 4.2.5 requiring more information to be provided by the ISO at the time of the referral and the requirement in section 4.2.3 for the ISO to copy the market participant on the referral partially addresses this concern when combined with the opportunity to provide additional information following the referral set out in section 4.2.4.</p> <p>In the summary investigation process where the MSA believes the record is substantially complete, the intent is to reach a determination with the information provided.</p> <p>In the expanded investigation process, section 6.3.4 sets out the requirement that records relied upon in the summary of findings, which could include additional information provided by the ISO, and affords the party under investigation an opportunity to respond prior to the MSA making an enforcement determination.</p>
<p>AESO: The right to be represented by counsel in all aspects of an MSA investigation.</p>	<p>A party under investigation already has the right to be represented by counsel in their interactions with the MSA.</p> <p>It is not clear what range of activity is intended to be covered in ‘all aspects’ of an investigation. For clarity, a party does not have the right to have their counsel participate in aspects of an investigation that do not involve interaction with that party or in internal MSA deliberations.</p>
<p>MSA: Additional information on the factors that the MSA considers when determining the incidence of penalties</p>	<p>The MSA drafted section 7.1.1 in response to this scope item which</p>

<p>for contravention(s) in relation to a given matter; this would be similar to the existing section 4.1 describing the factors considered when deciding whether forbearance is appropriate.</p> <p>AltaLink: Clarification on how the assessment of penalties within the existing penalty frameworks under AUC Rule 019 (ISO Rules) and AUC Rule 027 (Alberta Reliability Standards) may be applied. For example, per device, per BES cyber system, per individual, etc.</p> <p>AltaLink: Clarification if the assessment of penalties differs by ARS standard, sub-requirement or Rule 027 classification or any other factor.</p> <p>AltaLink: Examples and additional detail on how the factors referenced in the consultation, such as the nature, severity, and duration of non-compliance, compliance history, and self-reporting, will be applied in practice when determining penalty outcomes.</p> <p>TransAlta: TransAlta recommends that the MSA include criteria to identify when and how it will apply NSPs. Specifically, TransAlta suggests that the MSA identify criteria to decide when it will apply the following methods of issuing penalties:</p> <ul style="list-style-type: none"> • per occurrence; • per settlement interval (i.e., hour); • per day; • per month; or • another method. 	<p>partially addresses the recommended scope.</p> <p>Consideration was given to whether there was material additional guidance on the common interpretation of particular rules or standards that could be provided in the process, but given the range of potential fact patterns and the wide range of language in the ISO rules and reliability standards, the MSA determined that broadly applicable guidance, similar to s. 8 on forbearance, was not possible.</p>
<p>ATCO: Inclusion of factors that are considered in the assessment of the severity levels for contraventions of reliability standards (as listed in AUC Rule 027). A severity assessment, which forms the basis of the penalty should be provided to the market participants that are involved in the contravention.</p> <p>TC Energy: If not already contemplated for this consultation, TC Energy recommends including the MSA’s criteria for determining the materiality or harm of an ISO Rule or Alberta Reliability Standards contravention, as well as how these criteria relate to enforcement outcomes. Incorporating this information</p>	<p>Section 7.1.3 of the document adds guidance on determining Reliability Standard contravention severity that the MSA Enforcement staff can consider when making determinations of severity.</p> <p>The MSA will consider the feedback on the content of the notice of specified penalty alongside the comments in the last section of this document about enhanced reporting</p>

<p>would provide valuable transparency for market participants and enable compliance programs with limited resources to focus on the highest priority areas.</p> <p>TransAlta: TransAlta recommends that the MSA provide greater visibility into how penalty determinations are made, including the factors considered and the weighting applied to aggravating and mitigating circumstances. NERC's enforcement program publishes detailed penalty guidelines and rationales, which enhance industry understanding and foster consistency. A similar approach by the MSA would improve predictability and fairness in Alberta's compliance enforcement framework.</p> <p>Having such a program still promotes the self-identification and mitigation of potential contraventions with a minimal reliability risk as well as greatly reducing the administrative burden associated with the existing self-report practices on both registered entities and the MSA.</p>	<p>separately from the updates to the process document.</p>
<p>AESO: An investigated party will receive interview transcripts, as previously raised by market participants in the 2016 MSA Procedures Consultation</p>	<p>Section 6.3.4 specifies that records relied upon in the summary of findings will be provided to the party under investigation which can include extracts from transcripts of interviews.</p> <p>Transcripts, like other records gathered in an MSA investigation, are confidential. Given the range of potential circumstances, including the possibility of retaliation against whistleblowers or co-ordination between interviews, the MSA cannot commit to a blanket disclosure requirement immediately following the interview as was requested and ultimately rejected in 2016.</p>
<p>TransAlta: The MSA's investigation process should include disclosure requirements to a market participant at the conclusion of an investigation.</p> <p>The MSA's investigation process currently does not include any disclosure guidelines in respect of</p>	<p>A stipulation has been added to section 6.3.4 to include disclosure of the evidence relied upon in the summary of findings. Since the summary of findings comes before</p>

documents gathered, relied on, or used in the course of the MSA's investigation. As a measure to prevent recurrence, promote education and compliance, and identify root causes, TransAlta considers that providing disclosure of the MSA's records used in the investigation - regardless of outcome - could assist market participants in deepening their understanding of the MSA's compliance objectives and priorities, and identify areas to improve compliance tracking and reporting.

Capital Power: Market Participants should be informed of the evidence relied upon by the MSA in reaching their conclusion.

the disposition, this disclosure would come regardless of the determination.

A summary of findings would not normally be prepared in the summary investigation process or for investigations that are terminated prior to concluding the investigation so in these cases there be no further disclosure of the evidence relied upon.

Scope not addressed in the draft document:

Scope item	MSA response
<p>TransAlta: TransAlta recommends that the MSA adopt a risk-based prioritization framework for evaluating self-reports and potential contraventions. This framework should consider factors such as reliability impact, recurrence, and the effectiveness of internal controls. NERC's Compliance Monitoring and Enforcement Program (CMEP) emphasizes risk-based oversight to ensure resources are focused on issues that pose the greatest threat to system reliability. Implementing a similar approach would enhance efficiency and transparency in Alberta's compliance enforcement process.</p>	<p>The AESO as compliance monitor for market participants publishes risk priorities for reliability standards.</p> <p>The test for incoming matters described in section 5 requires the MSA to consider whether a Self-Report or referral is frivolous, vexatious or trivial or otherwise does not warrant investigation which is a narrower consideration than a broad risk-based prioritization.</p>
<p>Capital Power: Also, similar decisions should be treated consistently unless a legitimate reason exists to distinguish them. Changes in MSA leadership or personnel should not materially affect how investigations are resolved.</p>	<p>The determination in each matter depends heavily on the specific facts of the matter so that two situations that look facially the same may result in different determinations. In addition, the forbearance criteria laid out in section 8 includes consideration of prior reported matters, the entity's compliance program, the timing of notifications, and the extent of completed or planned mitigation, all of which extend beyond the details of the contravention itself.</p>
<p>Capital Power: Recognizing that there are many factors that impact the timeliness of a determination, consideration should be given to establishing reasonable target timeframes for decision based on investigation complexity. Undue delays can result in the remedy no longer being meaningful or relevant and can create challenges for the timely implementation of mitigations.</p>	<p>The MSA cannot commit to specific timelines, but believes there are a number of enhancements such as section 5 and section 6.2 that will lead to fewer undue delays in the processing of the majority of self-reports and referrals.</p>
<p>Capital Power: Regarding AESO-specified penalties, it is essential that the MSA collaborate effectively with the AESO to reduce administrative burden and enhance</p>	<p>The AUCA does not set out an exception for the ISO from specified penalties. AUC Rule 027 further sets</p>

<p>overall efficiency. Because the AESO is fully funded through tariffs and fees charged to Market Participants, any specified penalties issued to the AESO are ultimately borne by those participants. As such, a review of alternative enforcement mechanisms for the AESO would be appropriate.</p>	<p>out specific requirements on the communication of specified penalties where the ISO is the contravener.</p> <p>The MSA notes that administrative enforcement involves significantly higher costs than typical specified penalties.</p> <p>Section 6.1.12 has been added to discuss settlement agreements, which can be more efficient means to resolve a matter with appropriate Commission oversight.</p>
<p>ENMAX: Potential changes and outcomes from the MSA’s process should be tested with AUC Rule 019 and AUC Rule 027 to determine whether further guardrails, clarity and transparency can be reflected in these rules. During the MSA’s consultation, it would be beneficial to consider any unintended consequences or impacts that MSA’s proposed changes may have on other AUC or industry rules. For example, AUC Rule 013 sets out mitigating factors when issuing an administrative penalty, which may directly relate to data requirements that emerge from the changes proposed by the MSA in this consultation.</p>	<p>AUC Rules are the responsibility of the Commission; the changes included in the draft document have been evaluated for consistency with the current AUC Rules.</p>
<p>ATCO: Development of a guide on internal compliance program, and its key components that MSA uses in its assessments and/or forbearance.</p>	<p>The AESO as compliance monitor has consulted on developing an entity compliance profile as part of their compliance oversight plan. While the MSA is not obligated to use the AESO’s methodology when considering compliance programs for forbearance in a matter, in many cases the conclusions will align such that the MSA does not believe it would be helpful to have multiple sets of guidance applicable to market participants.</p>
<p>ENMAX: ENMAX believes it would be valuable to explore alternative methods to address transparency and clarity gaps of the new ISO rules before resorting to the MSA’s investigative powers. In situations where the</p>	<p>The MSA’s primary means of addressing suspected contraventions, as laid out in the AUCA, is through investigations. In</p>

MSA seeks clarification on a market participant's actions under the rules (and there is no indication or suspicion of wrongdoing), alternatives such as requests for information and technical meetings may provide for more efficient outcomes than a full investigation. This would allow the MSA to have open dialogue with market participants, many of which are making best efforts, in good faith, to navigate through a new and unclear framework. Should the MSA, through these alternative processes, determine that a market participant is not cooperating or acting in good faith, it still retains full authority to exercise its investigation and enforcement powers.

EDTI: Further to the posted scope, EDTI seeks to explore a collaborative feedback mechanism for assessing risk ahead of enforcement actions.

Capital Power: Consideration also needs to be given to Market Participants for new obligations such as long lead time requirements or changes to the rules due to the implementation of the Restructured Energy Market (REM). Market Participants are often attempting to interpret the obligations and revamping internal processes. Initially, Market Participants may interpret requirements differently, leading to inconsistent submissions among Market Participants and/or implementations which do not align with the AESO's expectations. Working with the AESO to understand whether implementation of rules is meeting expectations and providing clarity and guidance as opposed to issuing specified penalties aligns with section 39(4) of the AUC Act.

ENMAX: During this consultation, ENMAX believes that alternative approaches should be considered outside of formal investigation processes for initiatives that fall outside the MSA's regular scope, as well as in areas where the MSA is seeking greater transparency.

ENMAX: Initiatives Outside the MSA's Standard Processes – For initiatives outside the MSA's standard processes, such as those directed by government, there is an opportunity to establish a clearer upfront framework for stakeholder engagement. This would

the specific circumstance of the implementation of new ISO rules and reliability standards, the MSA would encourage implementation plans that include pre-implementation training and testing as well as post-implementation evaluations or discussions as part of the ISO-led rule and reliability standard development and implementation processes.

help ensure a collaborative and open dialogue between the MSA and industry.	
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Scope to be considered outside of the Investigation and Enforcement Process:

Scope item	MSA response
<p>ATCO: Implementation of a portal that manages compliance enforcement activities, including submission of all information by the market participants (self-reports, mitigation plans and any other data/records required as part of MSA's assessment). The portal would allow for secure and efficient communication and provide real-time access to information to both the market participants and the MSA.</p>	<p>The MSA is open to improvements such as fillable PDF forms and online portals that would improve efficient processing of matters. The MSA will consider this feedback following the consultation of the Investigation and Enforcement Process.</p>
<p>TransAlta: TransAlta recommends that the MSA provide guidance on how to distinguish background information from non-compliance details in self-reports and mitigation plans. Clear instructions or formatting standards would help entities include relevant context without inadvertently expanding the scope of the reported issue. NERC's guidance on self-reporting encourages concise descriptions of the violation while allowing supplemental information to be provided separately, which could serve as a model for this practice.</p>	<p>The addition of section 4.1.2 includes additional guidance on self-report content including contextual information such as mitigating internal controls.</p> <p>The MSA will further consider this feedback in a re-evaluation of the self-report form or portal following the consultation on the Investigation and Enforcement Process.</p>
<p>TransAlta: TransAlta recommends that the MSA should take further steps to meet its mandate of developing and publishing guidelines, as set out in section 39(4) of the Alberta Utilities Commission Act. TransAlta also submits that the introduction of Priority Compliance Monitoring areas would promote the MSA's mandate of establishing guidelines to support the fair, efficient and openly competitive operation of the electricity market.</p>	<p>The AESO as compliance monitor has the mandate to establish how to meet its obligations under the EUA and T-Reg.</p> <p>The MSA does not view the development of guidelines as within the scope of the Investigation and Enforcement Process, but takes the feedback under advisement.</p>
<p>EDTI: EDTI also proposes that the scope include consideration of a process for communicating learnings from events, referrals, self-reports or effective mitigations to industry. Establishing a mechanism for sharing insights may assist market participants in learning from one another and promote a more consistent understanding and application of the requirements for greater system reliability.</p>	<p>The MSA agrees that the content in the quarterly enforcement report, and potentially on the MSA data portal, can be expanded in consideration of these recommendations, subject to confidentiality requirements in the Market Surveillance Regulation and</p>

<p>TransAlta: TransAlta recommends that the MSA provide greater detail in its quarterly reporting on self-reports, NSPs, forbearance and no contravention, and include compliance and enforcement priorities for future reporting periods.</p> <p>The MSA should also share more information in these quarterly reports that would help market participants better understand the trends in non-compliance as well as the types of corrective actions that are being adopted to address those non-compliance risks. NERC files detailed spreadsheets for Compliance Exceptions, Find Fix Track, and Spreadsheet Notice of Penalties with FERC on a monthly basis. These are available for public consumption on both NERC and FERC websites. These spreadsheets include detailed descriptions of the noncompliance, risk assessment, mitigation, as well as the Regional Entity's assessment of aggravating and mitigation factors in their decision. The lessons learned contained in these spreadsheets can be used by other registered entities to further mature their respective compliance programs, improving overall reliability of the Bulk Electric System.</p>	<p>to the prudent allocation of resources within the MSA.</p>
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