

NOTICE OF SPECIFIED PENALTY

Date of Issue: September 27, 2019		Payment Due Date: October 28, 2019	
MSA File Number	RS2018-098	Specified Penalty Amount	\$1,500
Registered Entity Name	Imperial Oil Resources Limited		
Reliability Standard	COM-001-AB1-1.1	Self-Report	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Requirement	R7	Accepted Mitigation Plan	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Date of Referral/Self Report	April 25, 2018	Date of Contravention	May 1, 2015 to March 20, 2018

EVENT DETAILS

Pursuant to the Alberta Electric System Operator (AESO) Alberta Reliability Standards 2018–2020 Audit Schedule, the AESO conducted a scheduled Q2/2018 compliance monitoring audit of Imperial Oil Resources Limited. The applicable audit period with respect to COM-001-AB1-1.1 extended from May 1, 2015 to March 31, 2018. Based upon the AESO's Audit findings, COM-001-AB1-1.1 was contravened as follows:

From May 1, 2015 to March 20, 2018, Imperial Oil Resources Limited did not have operating instructions and procedures at the Kearl facility to enable continued operation of the interconnected electric system during the loss of voice and message telecommunication facilities. COM-001-AB1-1.1 states, in part:

R7 The ISO and each operator of a transmission facility must have written operating instructions and procedures to enable continued operation of the interconnected electric system during the loss of voice and message telecommunication facilities

MR7 Evidence of having written operating instructions and procedures as required in requirement R7 exists. Evidence may include electronic or hard copy of the operating instructions and procedures.

FINDINGS

Based upon the information obtained by the MSA, the MSA is satisfied that the event was a contravention of Reliability Standard COM-001-AB1-1.1, requirement R7.

MATERIAL FACTS

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

1. Self-report submitted by Imperial Oil Resources Limited to the MSA dated April 25, 2018.
2. Referral from the AESO to the MSA dated August 15, 2018, including the AESO Alberta Reliability Standards Compliance Monitoring Audit Report on the AESO Q2/2018 compliance monitoring audit of Imperial Oil Resources Limited.
3. Completed Mitigation Plan submitted on September 10, 2019 by Imperial Oil Resources Limited to the MSA.

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: 1400, 600 – 3rd Avenue S.W., Calgary, Alberta, T2P 0G5. Questions in respect of delivery of payment should be directed to the 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: Jeremy Smith (Financial Accountant) Jeremy.Smith@auc.ab.ca, and Greg Andrews (Investigator) Greg.Andrews@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 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.

SIGNATURE

Signature	"Original Signed"	Signature Date	September 27, 2019
Name	Anders Renborg	Title	Director, Compliance