

NOTICE OF SPECIFIED PENALTY

Date of Issue: September 24, 2014

Payment Due Date: October 24, 2014

MSA File Number:	RS2014-108	Specified Penalty Amount:	\$10,000
Registered Entity Name:	Dow Chemical Canada ULC		
Reliability Standard :	CIP-001-AB-1/CIP-001-AB1-1	Self Report:	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
Requirement:	R3	Accepted Mitigation Plan:	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
Date of Referral/Self Report:	September 18, 2014	Date of Contravention:	April 19, 2012 – October 10, 2012; May 10, 2013 – December 9, 2013

EVENT DETAILS

Pursuant to the Alberta Electric System Operator (AESO) Alberta Reliability Standards 2014-2016 audit schedule, the AESO conducted a scheduled Q2/2014 compliance monitoring audit of Dow Chemical Canada ULC. The applicable audit period with respect to CIP-001 extended from July 1, 2011 to March 31, 2014. Based upon AESO audit findings, CIP-001 was contravened as follows:

- 1) CIP-001-AB-1/CIP-001-AB1-1, R3. From April 19, 2012 up to October 10, 2012 and from May 10, 2013 to December 9, 2013, as during these periods, some operating personnel were not provided with sabotage event procedures and related contact information within the previous 12 months as required by R3. **R3** of the standard states:

R3 Each responsible entity must annually provide its operating personnel with sabotage event response procedures, including personnel to contact, for reporting sabotage events.

MR3 Written procedures exist, content is complete and meets the requirements of R3. Records indicate that operating personnel were provided with sabotage event response procedures and related contact information within the previous 12 months.

FINDINGS

Based upon the information obtained by the MSA, the MSA is satisfied that the event was a contravention of Reliability Standard CIP-001-AB-1/CIP-001-AB1-1, requirement R3.

MATERIAL FACTS

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

- 1) AESO Alberta Reliability Standards Compliance Monitoring Audit Report dated September 18, 2014 based upon findings of the AESO Q2/2014 reliability compliance audit of Dow Chemical Canada ULC.

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 Darin Lowther (Director, Market Rules) darin.lowther@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 24, 2014
Name:	Doug Doll	Title:	Manager, Compliance and Corporate Services