

Stakeholder Comment Form

TCM: Rule 9.4 AUC Re-Filing Proposal Paper

Date of Request for Comment: December 3, 2009
Period of Consultation: December 3, 2009- January 22, 2010

Stakeholder: AltaLink

Section of Paper	Description	Stakeholder Comments
1 Executive Summary	An overview of the key discussion points and proposals contained in the paper.	
2 Introduction	A brief history of Quick Hits rule development and reason for the paper.	
3 Background	A brief history of TCM Rule 9.4 development and reason for the paper.	
4 Recap of Commission Findings in the TCM Decision	A review Commission FEOC and public interest findings.	
4.1 i) Economic Dispatch	AESO use of merit order for dispatch is discussed.	
4.1 ii) Pool Price Impact	Transmission constraint impact on market is discussed	In para 117 of AUC Decision 2009-042, in addition to the statement quoted in the AESO’s Proposal Paper, AUC also made the following finding “However, the price impact must be monitored and TMR used to prevent or address undue market distortion or the exercise of undue market power”. In Alberta’s single price energy only market the price impact resulting from transmission congestion is a critical piece of

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		information for market participants to understand the price signals and the cost of insufficient transmission. AltaLink suggests that the AESO provide such information in a timely and transparent fashion by either estimating the hourly price impact and publishing it, or providing information such as stacking order data, number of congestion events, duration, MW volume congested, and others as deemed necessary to allow market participants to perform their own calculation to estimate the price impact resulting from transmission congestion.
4.1 iii) Compensation	A review of the requirement for compensation for being constrained down	
4.1 iv) Transmission “rights”	Generator’s “right” to access the AIES is discussed	
4.1 v) Use of TMR/DDS	AESO use of TMR/DDS is discussed.	
4.2 i) Long term investment impact	TCM impact on long term investment decisions is reviewed.	
4.2 ii) Use of business practices	AESO use of business practices for constraint management is discussed	
5 Discussion of Commission Directions in the TCM Decision	This section introduces the discussion of and the AESO proposals regarding each of the Commission directions.	
5.1 Clarify the Scope of the TCM Rule	A proposal on whether the TCM rule should be limited to real time or expanded to include planning stage elements is presented.	
5.2 Clarify the TCM/TMR	A review of how the AESO	

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Rule relationship	would move from the use of the TCM Rule to the use of TMR is presented.	
5.3 Consider ENMAX Pay as Bid Approach	The merit of using the ENMAX pay as bid proposal within the TCM protocol is discussed	
5.4 Define Key TCM Rule Terms	A proposal regarding specific TCM rule key terms is presented	
5.5 Clarify TCM Rule Process Steps	Specific TCM rule process steps are discussed together with proposals to provide additional clarity where appropriate.	
6 Next Steps	Stakeholder feedback on the TCM paper discussion and proposals is requested.	