



June 21, 2007

Dear Market Participants and Interested Parties:

Re: Proposed ISO Rules – Dispatch Down Service (DDS) Market Rules & OPP

The Alberta Electric System Operator (AESO) is seeking feedback on ISO/OPP Rule changes that are being considered for recommendation to the AESO Executive Rules Committee (“ERC”) in September 2007.

For your consideration, attached are the proposed ISO/OPP Rule changes that reflect a market-based version of Dispatch Down Service (DDS). These proposed ISO Rules are an enhancement to the contract-based DDS rules that were approved by the ERC in March 2007. Also included for reference is a [term sheet](#) defining the key terms and conditions of DDS. The term sheet is intended to provide participants with additional clarification with respect to the meaning of the proposed ISO/OPP Rules and their implementation.

The following grid is hyperlinked to provide assistance in directing you to the proposed ISO/OPP Rule changes.

Rule Number	Description	Level	Most relevant stakeholder interest
Part 1 - General G1 Definition; Part 2 - MPRs: 3, 6, 8, 10	DDS Market Rules	I	All Market Participants
OPP 101	Dispatching the Energy Market Merit Order	I	All Market Participants

Please see the attached summaries for more information on these proposed ISO/OPP Rule changes. *Each identified change provides a brief explanation of the reason for the change.*

Comments and suggestions on the ISO/OPP Rule changes being proposed are encouraged. Please use the comment matrix provided when submitting comments to the AESO on the proposed ISO/OPP Rule changes. Click [here](#) to access the comment matrix for the proposed ISO Rule changes. Click [here](#) to access the comment matrix for the proposed OPP Rule changes. Only written comments will be considered in finalizing the ISO/OPP Rule changes.



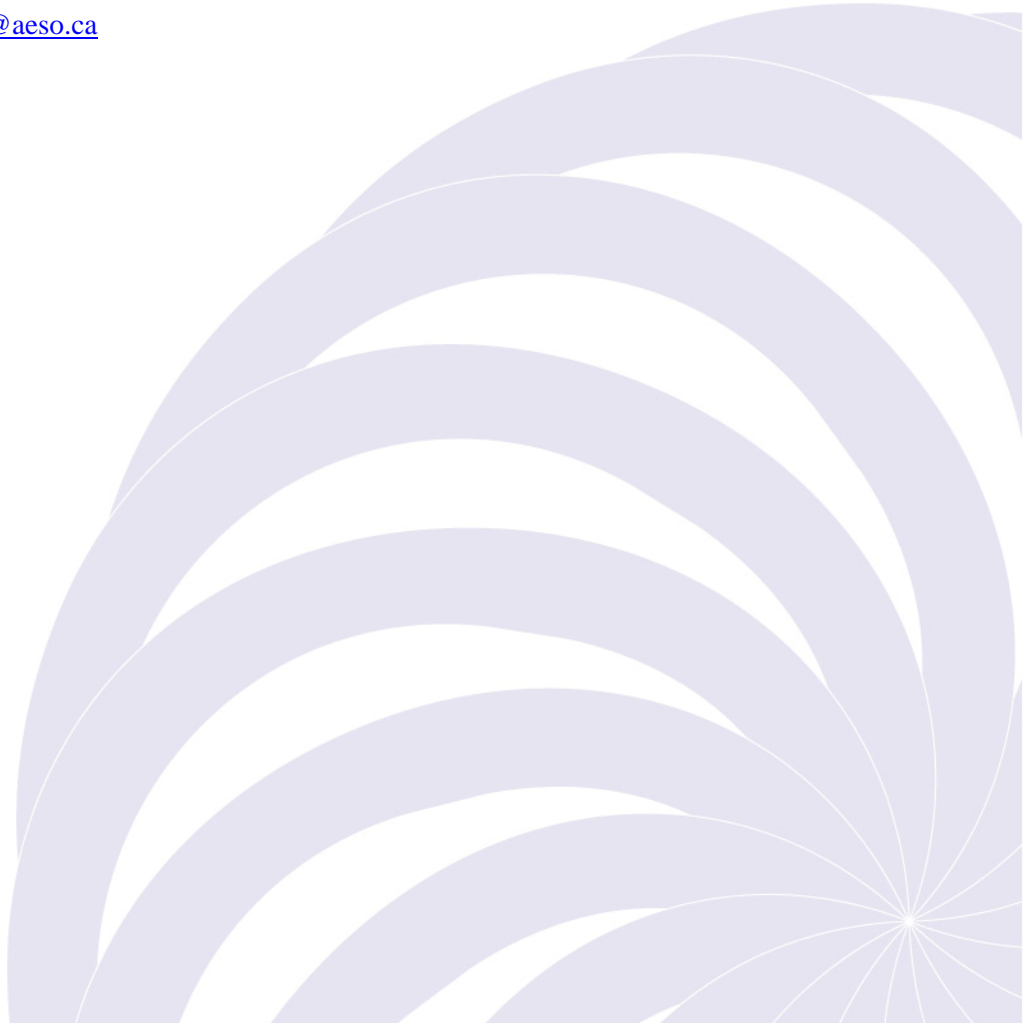
Please provide feedback or questions by **Friday July 6, 2007** to the *individual* specified within the ISO/OPP Rule change description following.

The AESO will be publishing all stakeholder comments received for industry review shortly after the comment deadline. Stakeholder comments received along with AESO responses will be published with the final proposed ISO/OPP Rule changes submitted to the ERC for approval in September 2007.

Yours sincerely,

Original Signed By

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Summary of Proposed ISO Rule Changes

Target Effective Date: Concurrent with the Implementation of Approved Market Policy Rules

Proposed LEVEL I ISO Rule Changes

Level 1 changes are changes that have a significant operational or financial impact on the industry or the ISO. These changes typically require working group input and/or extensive stakeholder consultation to implement an effective solution.

Dispatch Down Service (“DDS”) Market Rules - Revisions	
Rule Section/Number	<ol style="list-style-type: none"> 1. G1 Definitions 2. G8 Limitation of Liability 3. 3.5.1 Block Allocations 4. 3.5.2 Submission Timing 5. 3.5.3.5 Implementation of Offers 6. 3.5.5 Dispatch Down Service 7. 3.5.5.1 Submitting Dispatch Down Service Offers 8. 3.5.5.2 Mandatory Dispatch Down Service Energy Restatements 9. 3.5.5.3 Voluntary Dispatch Down Service Price Restatements 10. 3.9 Validity or Invalidity of Offers and Bids 11. 3.10 Reference Price 12. 6.3.2 Dispatch Content 13. 6.3.6.1 Dispatch Down Service – Eligibility 14. 6.3.6.2 Conditions for Dispatch Down Service Dispatch 15. 6.3.6.3 Determining Dispatch Down Service Quantity 16. 6.3.6.4 Dispatching Dispatch Down Service 17. 8.1.3 Dispatch Down Service Payment 18. 8.1.4 Dispatch Down Service Charge 19. 10.6 Trading Day History
Reason for Change	To support the full roll-out of the DDS concurrent with other Market Policy implementation rules. Certain proposed rules



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	contained with this document supersede those previously approved by the ERC, but not yet implemented.
AESO Contact	Market Services: Doug Simpson - doug.simpson@aeso.ca , (403) 539-2494 Ruppa Minhas - ruppa.minhas@aeso.ca , (403) 539-2589
From (current rule-as per consolidated rules approved by the ERC on April 3, 2006 and March 7, 2007)	To (Proposal)
<p>1. G1 Definitions</p> <p>“dispatch down service” means a voluntary service supplied by a source asset to be dispatched off, in accordance with rule 6.3.6.</p>	<p>1. G1 Definitions</p> <p>“current DDS submission” means a valid DDS offer submitted in accordance with rule 3.5.5 and includes any revision of prices and quantities in MW submitted for such DDS offer in accordance with rule 3.5.5.2 and 3.5.5.3</p> <p>“dispatch down service” (DDS) means a voluntary service offered by a source asset to be dispatched off, in accordance with rule 6.3.6.</p> <p>“DDS block” means the discrete MW level as identified within an offer and is the basis by which an asset receives a DDS dispatch.</p> <p>“DDS dispatch” means a direction given by the system controller to a pool participant to provide DDS.</p> <p>“DDS dispatched off” means a DDS dispatch has been issued for the termination of the provision of DDS.</p> <p>“DDS dispatched on” means a DDS dispatch has been</p>



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<p>“dispatch down service merit order” means the list of all valid dispatch down service providers sorted by the ISO in order of price.</p>	<p>issued for the provision of DDS.</p> <p>“DDS merit order” means a list of all valid DDS offers by DDS providers for a settlement interval consisting of DDS blocks sorted in order of price.</p> <p>“DDS offer” means a submission made by a pool participant in accordance with rule 3.5.5</p>
<p>2. G8 Limitation of Liability</p> <p>...No person has any liability to another as a result of scheduling or determination of the energy market merit order, or the ancillary service merit order by or for the ISO, dispatch by the system controller, or a failure by the system controller to dispatch an asset, or failure of a pool participant to provide electric energy pursuant to an offer and in accordance with an energy market dispatch, or a failure of a pool participant to take electric energy pursuant to a bid nor has any person any liability to another as result of the use of information made available or published through the ISO in accordance with these rules....</p>	<p>2. G8 Limitation of Liability</p> <p>...No person has any liability to another as a result of scheduling or determination of the energy market merit order, DDS merit order or the ancillary service merit order by or for the ISO, dispatch or DDS dispatch by the system controller, or a failure by the system controller to dispatch or DDS dispatch an asset, or failure of a pool participant to provide electric energy pursuant to an offer and in accordance with an energy market dispatch, or failure of pool participant to provide a service pursuant to a DDS offer and in accordance with a DDS dispatch, or a failure of a pool participant to take electric energy pursuant to a bid nor has any person any liability to another as result of the use of information made available or published through the ISO in accordance with these rules....</p>
<p>3. Rule 3.5.1 <u>Block Allocations</u></p> <p>The ISO will allocate to:</p>	<p>3. Rule 3.5.1 <u>Block Allocations</u></p> <p>The ISO will allocate to:</p>



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<p>a) each pool participant who has registered a generating asset, one asset per generating asset or registered aggregate asset, comprised of seven blocks.</p> <p>b) each importer, one asset per interconnection, with each asset comprised of one block with a \$0.00 offer price.</p> <p>c) each pool participant with energy consumption within a settlement zone, at least one asset for each such zone, with each asset comprised of seven blocks.</p> <p>d) each exporter, one asset per interconnection with each asset comprised of one block with a \$999.99 bid price.</p>	<p>a) Each pool participant who has registered a source asset, one asset per source asset or registered aggregate asset, comprised of seven blocks and one DDS block.</p> <p>b) Each importer, one asset per interconnection, with each asset comprised of one block with a \$0.00 offer price.</p> <p>c) Each pool participant with energy consumption within a settlement zone, at least one asset for each such zone, with each asset comprised of seven blocks.</p> <p>d) Each exporter, one asset per interconnection with each asset comprised of one block with a \$999.99 bid price.</p>
<p>4. Rule 3.5.2 <u>Submission Timing</u></p> <p>a) Any pool participant submitting an offer or bid for an asset must submit such offer or bid for the next trading day to the ISO before 12:00 hours of the day before the next trading day.</p> <p>b) A pool participant may submit an offer or bid for the forecast scheduling period.</p> <p>c) In accordance with rule 3.7, a pool participant may submit a standing offer or standing bid.</p>	<p>4. Rule 3.5.2 <u>Submission Timing</u></p> <p>a) Any pool participant submitting an offer or bid for an asset must submit such offer or bid for the next trading day to the ISO before 12:00 hours of the day before the next trading day.</p> <p>b) A pool participant may submit an offer or bid for the forecast scheduling period.</p> <p>c) In accordance with rule 3.7, a pool participant may submit a standing offer or standing bid.</p> <p>d) Any pool participant submitting a DDS offer for an asset may submit such offer to the ISO at any time prior to two hours before the start of any settlement interval.</p>



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<p>5. Rule 3.5.3.5 <u>Implementation of Offers</u></p> <p>a) The ISO will implement revisions to offers in the manner outlined in rules 3.5.3.2 and 3.5.3.3.</p> <p>b) When a generating asset has been issued both an ancillary service dispatch and an energy market dispatch for the same period, the ISO will deduct the quantity of MW in such ancillary service dispatch from the available capability of such asset for the purposes of determining the quantity of MW of the energy market dispatch. Such determination will be undertaken in the same manner as energy restatements pursuant to rule 3.5.3.2 a).</p>	<p>5. Rule 3.5.3.5 <u>Implementation of Offers</u></p> <p>a) The ISO will implement revisions to offers in the manner outlined in rules 3.5.3.2 and 3.5.3.3.</p> <p>b) When a source asset has been issued both an ancillary service dispatch and an energy market dispatch for the same period, the ISO will deduct the quantity of MW in such ancillary service dispatch from the available capability of such asset for the purposes of determining the quantity of MW of the energy market dispatch. Such determination will be undertaken in the same manner as energy restatements pursuant to rule 3.5.3.2 a).</p> <p>c) When a source asset has been issued a DDS dispatch, the ISO will deduct the quantity of MW in such DDS dispatch from the in merit amount in the source asset's offer for the purposes of determining the quantity of MW of the energy market dispatch. The ISO will deduct such quantity from the offer in ascending order starting with the lowest priced block of such source asset.</p>
<p>6. No existing rule</p>	<p>6. Rule 3.5.5 <u>Dispatch Down Service</u></p> <p>A pool participant's DDS offer for each source asset must consist of price in \$/MW, in accordance with rule 3.9 c) and quantity in MW for the DDS block allocated to the source asset.</p>



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	<p>If a DDS offer for a settlement interval is determined by the ISO, as per rule 6.3.6.1, to be ineligible to provide DDS for such settlement interval, no DDS payment shall be payable by the ISO to the pool participant for such settlement interval.</p>
<p>7. No existing rule</p>	<p>7. Rule 3.5.5.1 Submitting DDS Offers</p> <ul style="list-style-type: none"> a) A pool participant with a source asset may submit a DDS offer. Such offer quantity must not be less than 10 MW. b) The quantity (MW) of each such DDS offer must not total more than the available capability less the minimum stable generation of the source asset. c) The DDS block of a DDS offer must be a flexible block.
<p>8. No existing rule</p>	<p>8. Rule 3.5.5.2 Mandatory DDS Energy Restatements</p> <ul style="list-style-type: none"> a) A DDS energy restatement is permitted within two hours before the start of any settlement interval and only for an acceptable operational reason. b) A pool participant who has submitted a DDS offer must submit a DDS energy restatement restating as soon as reasonably practicable, if there is a change in the pool participant's ability to comply with a current DDS submission or DDS dispatch. c) A pool participant must record and provide to the ISO, if requested and within a reasonable time from such request, the basis on which it determined that there was an acceptable operational reason.



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<p>9. No existing rule</p>	<p>9. Rule 3.5.5.3 Voluntary DDS Price Restatements</p> <p>a) A DDS price restatement is only permitted prior to two hours before the start of any settlement interval.</p> <p>b) A DDS price restatement is a revised DDS offer of an asset which restates the price in \$/MWh or the quantity in MW or both, for the DDS block allocated to a pool participant's source asset.</p>



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<p>10. Rule 3.9 Validity or Invalidity of Offers and Bids</p> <p><i>To be considered valid, offers and bids must meet specific price tests, and be acknowledged by the ISO.</i></p> <p>a) Any offer price or bid price must be specified to the nearest cent per MWh, must be greater than or equal to \$0/MWh and must be less than \$1000/MWh.</p> <p>b) The ISO will, as soon as reasonably practicable following the receipt of an offer or bid send to the pool participant who submitted the offer or bid:</p> <ul style="list-style-type: none"> i) Acknowledgment of receipt of the offer or bid; and ii) notification that the offer or bid is either valid or invalid with respect to these rules and the information required in accordance with software and procedures. If an offer or bid is, in the opinion of the ISO, invalid, such notification will include explanation why the offer or bid is not accepted. 	<p>10. Rule 3.9 Validity or Invalidity of Offers and Bids</p> <p><i>To be considered valid, offers and bids must meet specific price tests, and be acknowledged by the ISO.</i></p> <p>a) Any offer price or bid price must be specified to the nearest cent per MWh, must be greater than or equal to \$0/MWh and must be less than \$1000/MWh.</p> <p>b) The ISO will, as soon as reasonably practicable following the receipt of an offer or bid send to the pool participant who submitted the offer or bid:</p> <ul style="list-style-type: none"> i) acknowledgment of receipt of the offer or bid; and ii) notification that the offer or bid is either valid or invalid with respect to these rules and the information required in accordance with software and procedures. If an offer or bid is, in the opinion of the ISO, invalid, such notification will include explanation why the offer or bid is not accepted. <p>c) A pool participant's DDS offer for each source asset must consist of price which shall be an amount not lower than - \$999.99 nor higher than \$0.00.</p>
<p>11. Rule 3.10 Reference Price</p> <p>a) The system controller may, when the system marginal price is</p>	<p>11. Rule 3.10 Reference Price</p> <p>a) The system controller may, when the system marginal</p>



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<p>below or equal to the reference price, dispatch dispatch down service in accordance with rule 6.3.6; in no event may the reference price be used to set the system marginal price.</p>	<p>price is below or equal to the reference price, dispatch DDS in accordance with rule 6.3.6. In no event may the reference price be used to set the system marginal price.</p>
<p>12. Rule 6.3.2 Dispatch Content</p> <p><i>The system controller will provide the pool participant specific information in the energy market dispatch.</i></p> <p>The information provided to the pool participant for an energy market dispatch shall include the information set out below, but shall not include any information that the system controller deems to be competitive market information:</p> <ul style="list-style-type: none"> a) Name of the asset receiving an energy market dispatch; b) The dispatch instruction (dispatch on or dispatch off) for the asset; c) Specific MW value to which the asset is receiving an energy market dispatch to; d) Date and time the energy market dispatch is to take effect. 	<p>12. Rule 6.3.2 Dispatch Content</p> <p><i>The system controller will provide the pool participant specific information in the energy market or DDS dispatches.</i></p> <p>The information provided to the pool participant receiving an energy market dispatch or DDS dispatch shall include the information set out below, but shall not include any information that the system controller deems to be competitive market information:</p> <ul style="list-style-type: none"> a) Name of the asset; b) The instruction (dispatch on, dispatch off, DDS dispatch on, or DDS dispatch off) for the asset; c) Specific MW value to which the asset is receiving an energy market dispatch or DDS dispatch; d) Date and time the energy market dispatch or DDS dispatch is to take effect.
<p>13. Rule 6.3.6 Dispatch Down Service Dispatch</p> <p>6.3.6.1 <u>Dispatch Down Service Dispatch - Eligibility</u></p>	<p>13. Rule 6.3.6 DDS Dispatch</p> <p>6.3.6.1 <u>Eligibility</u></p> <p>Eligibility may be determined at the sole discretion of the ISO.</p>



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<p>a) Subject to 6.3.6.1 b), a generating asset is eligible to be dispatched off in the energy market merit order for dispatch down service when the pool participant has entered into a contract with the ISO to provide dispatch down service;</p> <p>b) A generating asset is not eligible to be dispatched off in the energy market merit order for dispatch down service when:</p> <ul style="list-style-type: none"> i) such dispatch would cause transmission must-run to be required. ii) such dispatch would be in an area where one or more generating assets are constrained down. iii) any eligibility provision of dispatch down service within the dispatch down service contract between the ISO and the pool participant is not met for the generating asset; 	<p>a) Subject to rule 6.3.6.1 b), a source asset is eligible to be dispatched off in the energy market merit order for DDS when the pool participant submits an offer for DDS to the ISO in accordance with rule 3.5.</p> <p>b) A source asset is not eligible to be dispatched off in the energy market merit order for DDS when:</p> <ul style="list-style-type: none"> i) such dispatch would cause transmission must-run to be required. ii) such dispatch would be in an area where one or more source assets are constrained down. iii) such dispatch would impair the source asset's ability to comply with an ancillary service dispatch or directive. iv) the pool participant is unable to respond to such dispatch.
<p>14. 6.3.6.2 <u>Conditions for Dispatch Down Service Dispatch</u></p> <p>a) If at any time:</p> <ul style="list-style-type: none"> i) the system marginal price is less than or equal to the reference price, and ii) a generating asset has been issued a transmission must-run dispatch or directive, and 	<p>14. 6.3.6.2 <u>Conditions for DDS Dispatch</u></p> <p>a) If at any time:</p> <ul style="list-style-type: none"> i) the system marginal price is less than or equal to the reference price, and ii) a source asset has been issued a transmission must-run dispatch or directive, and



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<p>iii) the transmission must-run quantity (MW) is greater than constrained down directive quantity (MW) as calculated by the system controller.</p> <p>then the system controller will dispatch off operating blocks in the energy market merit order that have offered eligible dispatch down service.</p> <p>b) Operating blocks will not be dispatched off in the energy market merit order for dispatch down service when the system marginal price is greater than the reference price.</p>	<p>iii) the transmission must-run quantity (MW) is greater than constrained down directive quantity (MW) as calculated by the system controller.</p> <p>then the system controller will dispatch off operating blocks in the energy market merit order that have offered eligible DDS.</p> <p>b) Operating blocks will not be dispatched off in the energy market merit order for DDS when the system marginal price is greater than the reference price.</p>
<p>15. 6.3.6.3 <u>Determining Dispatch Down Service Quantity</u></p> <p>a) Subject to 6.3.6.3 b), the dispatch down service dispatch quantity (MW) is the lesser of:</p> <ul style="list-style-type: none"> i) the transmission must-run quantity (MW) less the constrained down directive quantity (MW). The dispatch down service dispatch quantity (MW) cannot be less than zero MW. ii) the eligible quantity of dispatch down service offers. <p>b) Operating blocks in the energy market merit order that have been dispatched off for dispatch down service will be dispatched on by the system controller prior to dispatching operating blocks that are greater than the reference price.</p>	<p>15. 6.3.6.3 <u>Determining DDS Dispatch Quantity</u></p> <p>a) Subject to 6.3.6.3 b), the DDS dispatch quantity (MW) is the lesser of:</p> <ul style="list-style-type: none"> i) the transmission must-run quantity (MW) less the constrained down directive quantity (MW). The DDS dispatch quantity (MW) cannot be less than zero MW. ii) the eligible quantity of DDS offers. <p>b) Operating blocks in the energy market merit order that have been dispatched off for DDS will be dispatched on by the system controller prior to dispatching operating blocks that are greater than the reference price.</p>



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<p>16. Rule 6.3.6.4 <u>Dispatching Dispatch Down Service</u></p> <p>The system controller will determine which generating assets will be dispatched for dispatch down service in order of relative economic merit.</p> <p>If a dispatch down service offer is determined by the ISO to be ineligible to provide dispatch down service and it is next in the order of economic merit, then the system controller will dispatch the next operating block in the energy market merit order for dispatch down service that is eligible to provide dispatch down service.</p>	<p>16. Rule 6.3.6.4 <u>Dispatching DDS</u></p> <p>The system controller will use the same form of dispatch as provided in rule 6.3.2.</p> <p>The system controller will determine which source assets will be dispatched for DDS in order of relative economic merit and eligibility considerations outlined in rule 6.3.6.1.</p> <p>If a DDS offer is determined by the ISO to be ineligible to provide DDS and it is next in the order of economic merit, then the system controller will dispatch the next operating block in the energy market merit order for DDS that is eligible to provide DDS.</p>
<p>17. Rule 8.1.3 <u>Dispatch Down Service Payment</u></p> <p>The ISO will calculate and include payments for dispatch down service on the pool statement. The amount payable for the dispatch down service will be calculated by the ISO in accordance with the contract for the dispatch down service between the ISO and the pool participant.</p>	<p>17. Rule 8.1.3 <u>DDS Payment</u></p> <p>The ISO will calculate and include payments for DDS on the pool statement.</p> <p>A pool participant with a source asset that has provided DDS pursuant to a DDS dispatch during a settlement interval is eligible to receive a DDS payment for the settlement interval, the amount calculated by the following formula:</p> $\frac{\text{DDS price (\$)} \times \text{DDS quantity (MW)} \times \text{DDS time (minutes)}}{60 \text{ minutes}}$



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	<p>Where for purposes of this rule 8.1.3, the following applies:</p> <p>DDS price is the system marginal price plus the DDS offer price for the settlement interval.</p> <p>DDS quantity means the amount (MW) a pool participant is dispatched for DDS in the settlement interval.</p> <p>DDS time means the number of minutes a source asset was dispatched for DDS in the settlement interval.</p>
<p>18. Rule 8.1.4 Dispatch Down Service Charge</p> <p>A pool participant must forward to the ISO in respect of electric energy supplied by it in a settlement interval the amount calculated by the following formula:</p> <p>Dispatch down service payment in \$ = (energy production in MWh) divided by (sum of all energy production in MWh) multiplied by (sum of all dispatch down service payments)</p> <p>where:</p> <p>“dispatch down service payment” is as prescribed under rule 8.1.3.</p>	<p>18. Rule 8.1.4 DDS Charge</p> <p>The ISO will calculate and include charges for DDS on the pool statement.</p> <p>A pool participant with a source asset that has generated during a settlement interval will receive a charge for the settlement interval, the amount calculated by the following formula:</p> $\frac{\text{energy production (MWh)}}{\text{(sum of all energy production (MWh))}} \times \text{sum of all DDS payments}$ <p>where:</p> <p>“DDS payment” is as prescribed under rule 8.1.3.</p> <p>“energy production in MWh” is the metered MWh value for a source asset that has generated during a settlement interval.</p>



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<p>19. Rule 10.6 <u>Trading Day History</u></p> <p>g) Summary of aggregated TMR dispatch quantities (MWh), aggregated dispatch down service dispatches (MWh) and reference price by settlement interval.</p>	<p>19. Rule 10.6 <u>Trading Day History (administrative amendment only)</u></p> <p>g) Summary of aggregated TMR dispatch quantities (MWh), aggregated DDS dispatches (MWh) and reference price by settlement interval.</p>
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OPP 101 Dispatching the Energy Market Merit Order	
Rule Section/Number	Part 3, OPP 101 Dispatching the Energy Market Merit Order
Reason for Change	<p>This OPP is being revised to implement the proposed Dispatch Down Service Market Rules.</p> <p>Also removed section 5.9, SC procedure to address failure of the dispatch tool, which was added in a previous draft version. This section will be considered together with the review of the market suspension requirements in OPP 201.</p>
AESO Contact	Operating Policy and Procedures, Anita Lee, anita.lee@aeso.ca , (403) 539-2497
From (Current Rule)	To (Proposal)
	<p>See attached – blacklined version. OPP101DRAFT2 - blacklined</p> <p>See attached – clean version. OPP101DRAFT2 – clean</p>