

E-Mailed comments from TransAlta Corporation
Received October 29, 2009

TransAlta appreciates the opportunity to provide feedback on the ISO proposed improvements to the stakeholder consultation process

1. TransAlta appreciates the AESO moving forward in trying to make the stakeholder process more consistent and transparent we also value flexibility. Flexibility is required in terms of allowing for informal discussions this helps in development of more creative solutions that often lead to more of a win/win for all. Thus we do not believe the AESO should focus solely on written comments and needs to ensure it allows for this informal discussion to occur. The AESO needs to consider striking a balance between these two rather than solely focusing on the written comment.

2. Terms of Reference Document

- the AESO needs to develop a threshold set of criteria required for an issue to move to stakeholder consultation and rule development this is missing in the defined process.

- this may be covered through definition of the problem that includes impacts of current design issues and benefits of change. A statement such as "things must change and we must move ahead" in itself is not a valid reason to move ahead with a consultation. Thus we would like to see justification and criteria provided based on a problem definition.

3. There some statements with in the documents that are looking to commit stakeholder where it is unnecessary. As this is an information document I think this wording is too strong and unnecessary. As I understood it at the stakeholder meeting the AESO wants to encourage full participation which is an appropriate goal. All references to commitments like those outline in principles like those under Principles should be removed an example for rewording of the 11th principle would be:

In order to ensure an effective consultation, each stakeholder **is strongly encouraged** to raise all concerns or suggestions for improvement, to provide those concerns or suggestions for improvement in writing for discussion with others in the consultation process and to share information for others to understand and evaluate those concerns or suggestions for improvement in a full and effective manner.

4. Comment Matrix Form

The current AESO Comment Matrix form for draft rules is in need of improvement. The current model cut and pastes the rule into section for comment by the stakeholder. This is difficult to read for your own comments never mind another's. Color highlighting stakeholder comments in the current form may help. Or one with 3 columns - AESO proposed changes, Stakeholder Concern, & Stakeholder suggestions . It may be worthwhile to delete the proposed changes and have stakeholder reference them instead. The inclusion of all the rule language is making the form very long and hard to find the portions where the participant is provided their comments and proposed changes. As a stakeholder we like to review other stakeholder's comments by section and find this difficult to do in the current form.

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5. Stakeholder Position

The AESO is proposing as a final step in their process that stakeholders submit their final position in writing. We believe this is limiting in terms of discussion and unnecessary. The AESO has all the written comments through the process, meeting and discussions it can hold to gauge stakeholder concerns and issues through out the process. We understand from the meeting that the AESO is considering this to a voluntary step. However we think it is an unnecessary step. The current comment matrix form has a box to check for support, or not. We believe there is little upside for stakeholder in checking this box as if they change their mind at some point it could be used against them in a hearing setting. We would make the same comment about the Stakeholder position paper. The AESO has enough information through their current process for the AESO to understand stakeholder positions.

Thanks

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