

<p>Period of Comment: May xx, 2021 through May xx, 2021</p> <p>Comments From: ENMAX Corporation</p> <p>Date: 2021/05/25</p>	<p>Contact: Mark McGillivray</p> <p>Phone:</p> <p>Email: MMcGillivray@enmax.com</p>
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Instructions:

1. Please fill out the section above as indicated.
2. Email your completed comment matrix to rules_comments@ieso.ca.

The AESO is seeking comments from Stakeholders in regards to the following matters:

	Question	Stakeholder Comments
1.	Please comment on Session #2 hosted on April 29, 2021. Was the session valuable? Was there something the AESO could have done to make the session more helpful?	Yes, the session was valuable.
2.	Do you have any feedback on the “transmission access” issues identified by the AESO?	The issues identified appear reasonable.

	Question	Stakeholder Comments
3.	<p>Are there any “transmission access” alternatives the AESO did not identify that would be effective in resolving the issues raised? If yes, please provide a detailed description of the solution and how it addresses the issues.</p>	<p>It may be worth further exploring if option 2 (STS reduction) should be expanded to allow a mothballed generator to extend their outage beyond the maximum term, and provide the generator with an option to either relinquish their STS contract or return to service if a new project wanted to connect in the same area.</p> <p>However, if such an option is contemplated, it should not compromise market transparency and stability. ENMAX would expect that the driver of a mothballed outage would remain unchanged (i.e., it is forecasted that a unit is unable to recover its avoidable costs for a temporary period of time).</p> <p>Market signals and investor confidence could become distorted if there is insufficient information about mothballed units that may or may not return to the market. Consideration would be needed on if a maximum term for mothballed outages and/or minimum return to service should remain.</p> <p>The connection process would also need to provide enough certainty for projects in the queue and should not result in additional costs.</p>
4.	<p>Do you have a preference for a transmission access alternative? Do you believe any of the alternatives should be removed from consideration? Please explain, taking into consideration the key principles of open competition, cost causation, fairness and stability, outlined in the April 29, 2021 presentation.</p>	<p>No comment at this time. See Response to Question 3.</p>
5.	<p>Are you supportive of the AESO’s recommendation to maintain the existing 24-month maximum duration? Please explain.</p>	<p>No comment at this time. See Response to Question 3.</p>
6.	<p>Do you agree with the current ISO rule requiring the return to service for 3 months before taking a subsequent mothball outage? Or, if the time between mothball outages is extended, what is an appropriate timeline? Please explain.</p>	<p>No comment at this time. See Response to Question 3.</p>

	Question	Stakeholder Comments
7.	Do you have any additional feedback on the interdependencies between transmission access, maximum duration, and subsequent outages? Please explain.	See Response to Question 3.
8.	Are you supportive of the AESO's recommendation to align market participant outage cancellation notification with the declared return to service timelines? Please explain.	Agreed, this would allow for greater transparency to the market. Owners should disclose prior to taking any action to return to service (awarding contracts, informing staff etc.).
9.	The AESO is considering shortening the minimum outage cancellation notification timeline. Please provide a recommended minimum timeline that allows for the flexibility needed to make business decisions. Note, the AESO requires a minimum of 30 days-notice.	The minimum outage cancellation notification timeline should be at least 3 months or the minimum amount of time it will take the unit to return to service.
10.	Are you supportive of the AESO's recommendation to maintain the existing 3-month notification requirement with the ability to request a waiver for taking a mothball outage? Please explain.	Agreed.
11.	Are you supportive of the AESO's proposal for separate mothball outage reporting? Please explain.	<p>Yes, ENMAX is supportive of the AESO's proposal for separate mothball outage reporting as these are different than forced or planned outages and would provide greater transparency to the market.</p> <p>Given the AESO is able to direct a mothballed outage to return to service for a reliability reason, information on the call-back window should be provided as well.</p>
12.	Are you supportive of maintaining the 36-hour maximum start-up time for long lead time assets and a proposed modification to the rule to apply a maximum start-up time to long lead time type 2 assets? Please explain.	Agreed, a 36-hour maximum startup-up time for long-lead time assets is reasonable.
13.	Do you have any additional comments?	No additional comments.