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| |  |  |  |  | | --- | --- | --- | --- | | **Period of Comment:** | September 7, 2018 | through | September 28, 2018 | | **Comments From:** | Company Name | | | | **Date [yyyy/mm/dd]:** |  | | | | |  |  | | --- | --- | | **Contact:** | Company Contact | | **Phone:** | Contact Phone Number | | **Email:** |  | |

***Please provide comments relating to the subsection of the proposed amendments to the rule in the corresponding box. Please include any views on*** ***whether the language clearly articulates the requirement for either the AESO or a market participant, and provide any proposed alternative wording by blacklining the proposed language below.***

| **Section** | **Subsection** | **Proposed language** | **Stakeholder comments** |
| --- | --- | --- | --- |
|  |  | **Requirements**  **State of Supply Surplus and Multiple Zero Dollar ($0) Offers** |  |
| **2** | **(1)** | If during a current hour the **ISO** forecasts that the **interconnected electric system** will experience a state of supply surplus in the next hour, as evidenced by the in merit electricity supply consisting of only multiple $0.00 **offers** and the supply of electricity available from these **offers** exceeds the **system load**, then the **ISO** may curtail next hour $0.00 import **interchange transactions** to balance system supply and **system load**. |  |
| **2** | **(2)** | Subject to subsection 2(3), if during a current hour the **ISO** determines that a state of supply surplus is imminent in the current hour or already exists, then the **ISO** must comply with the following procedures as may be required, in the following sequence, to balance system supply and **system load**:  (a) initiate curtailment of $0.00 import **interchange transactions**;  (b) allow **pool participants** to submit **bids** to increase export **interchange transactions** within 2 hours of the start of a **settlement interval**;  (c) allow **pool participants** to submit **offers** to decrease import **interchange transactions** within 2 hours of the start of a **settlement interval**;  (d) allow **pool participants** to submit restatements reducing generating **source asset** output, or increasing load **sink asset** consumption, within 2 hours of the start of a **settlement interval**;  (e) issue **dispatches** in accordance with Section 202.3 of the **ISO rules**, *Issuing Dispatches for Equal Prices*;  (f) notwithstanding subsection 2(2)(e), if there are generating **source assets** with $0.00 **offers** for **inflexible blocks** stating volumes greater than their declared **minimum stable generation**, then issue **directives** to curtail those generating **source assets** to their declared **minimum stable generation**, starting with the generating **source assets** having the greatest difference in MW between the then current dispatch level and **minimum stable generation** and continuing in descending order until all those generating **source assets** have received **directives**; and  (g) issue **directives** for any other necessary actions, including shutting down generating **source assets**, to ensure system **reliability**. |  |
| **2** | **(3)** | If the **ISO** determines that a generating **source asset** is running at a generation level higher than its **minimum stable generation** in order to provide **regulating reserve**, then the **ISO** may, as part of the effective execution of the procedures set out in subsection 2(2), issue a **dispatch** to curtail delivery of **regulating reserve** from that generating **source asset** and issue a **dispatch** for **regulating reserve** to another generating **source asset** which can provide **regulating reserve** while operating at a lower generation level at or above **minimum stable generation**. |  |
| **2** | **(4)** | If during a current hour the present, real time operating conditions change such that the **ISO** determines that following the procedural sequence set out in subsections 2(2) and 2(3) would put the **ISO** in contravention of any **reliability** **standard** requirement by failing to achieve compliance within the operating limits or required response time specified in that **reliability standard**, then the **ISO** may alter the procedural sequence. |  |
| **2** | **(5)** | If the **ISO** alters the procedural sequence as set out in subsection 2(4), then once the **ISO** is assured that the **interconnected electric system** is operating in a safe and reliable mode, the **ISO** must recommence the procedural sequence set out in subsections 2(2) and 2(3). |  |

***Please provide your comments on the following (as set out in AUC Rule 017 s. 13(b-j)):***

| **Item #** |  | **Stakeholder comments** |
| --- | --- | --- |
| 1 | whether you agree that amended ISO rule –Section 202.5, *Supply Surplus* relates to the capacity market and why or why not |  |
| 2 | whether you agree that amended ISO rule – Section 202.5, *Supply Surplus* should [or should not] be in effect for a fixed term and why or why not |  |
| 3 | whether you understand and agree with the objective or purpose of amended ISO rule – Section 202.5, *Supply Surplus* and whether, in your view, Section 202.5, *Supply Surplus* meets the objective or purpose |  |
| 4 | how, in your view, amended ISO rule – Section 202.5, *Supply Surplus* affects the performance of the capacity market and the electricity market |  |
| 5 | your views on any analysis conducted or commissioned by the AESO supporting amended ISO rule – Section 202.5, *Supply Surplus* |  |
| 6 | whether you agree with amended ISO rule – Section 202.5, *Supply Surplus* taken together with all ISO rules and in light of the principle of a fair, efficient and openly competitive market |  |
| 7 | whether you would suggest any alternatives to amended ISO rule – Section 202.5, *Supply Surplus* |  |
| 8 | whether you agree that the proposed provisional rule supports ensuring a reliable supply of electricity at a reasonable cost to customers and why or why not |  |
| 9 | whether you agree that the proposed provisional rule supports the public interest and why or why not |  |

***Please provide your views on the type of content that should be included in an information document associated with amended ISO rule – Section 202.5, Supply Surplus.***

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