

Stakeholder Comment Matrix – August 6, 2020

Development of a Proposed Amended ISO rule - Section 505.2 of the ISO Rules, Performance Criteria for Refund of Generating Unit Owner's Contribution



<p>Period of Comment: August 6, 2020 through August 21, 2020</p> <p>Comments From: TransCanada Energy Ltd. (TCE)</p> <p>Date: 2020/08/21</p>	<p>Contact: Mark Thompson</p> <p>Phone: 403-589-7193</p> <p>Email: markj_thompson@tcenergy.com</p>
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Instructions:

1. Please fill out the section above as indicated.
2. Please refer back to the Consultation Letter under the “Attachments” section to view materials related to the proposed amended ISO rule Section 505.2, Performance Criteria for Refund of Generating Unit Owner's Contribution (“Section 505.2”)
3. Please respond to the questions below and provide your specific comments(if any). Blank boxes will be interpreted as favourable comments.

The AESO is seeking comments from Stakeholders on the development of proposed amended ISO rule Section 505.2, Performance Criteria for Refund of Generating Unit Owner's Contribution (“Section 505.2”), with regard to the following matters:

	Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
1.	Do you agree or disagree that the issue identified requires the development of proposed amended ISO rule Section 505.2? Please comment.	TCE agrees that if the changes requested in its compliance filing are approved, the ISO rule should be updated to reflect such changes. TCE supports efforts to reduce the regulatory burden, but submits that caution must be exercised to ensure that there are no unintended consequences as a result.
2.	Do you agree or disagree with the potential objective or purpose of proposed amended ISO rule Section 505.2? Please comment.	TCE submits that the ISO rule should be updated to reflect the Alberta Utilities Commission’s decision regarding the AESO’s Compliance Filing Application, which may not be consistent with the changes requested by the AESO in that application. TCE supports efforts to reduce the regulatory burden, but submits that caution must be exercised to ensure that there are no unintended consequences as a result.



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3.	Do you agree or disagree with the proposed form of consultation and timelines? Please comment.	<p>TCE supports the proposal to commence consultation on the proposed rule changes in Q3 2020. Without seeing the proposed changes, it is difficult for TCE to determine what further consultation would be required.</p> <p>In general, TCE does not support the use of an expedited rule process barring exceptional circumstances. In this case an expedited process may be warranted only for those proposed changes that relate to the compliance filing, and only if the timing of the compliance filing decision and consultation do not allow sufficient time for the AESO to meet its required deadlines. However, TCE submits that an expedited process to consider the proposed changes related to reducing the regulatory burden would be inappropriate. Instead, TCE suggests that the AESO could seek to combine the consideration of such proposed changes with the subsequent process pursuant to subsection 20.6(6) of the <i>Electric Utilities Act</i>.</p>
4.	Do you intend to participate in any related consultation? OR Do you agree that no consultation group is required for this rule development? Please comment.	TCE intends to participate in the consultation.
5.	Do you have any additional comments?	TCE has no further comments.