

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*



Period of Comment: August 6, 2020 through August 21, 2020

Comments From: Capital Power Corporation

Date: 2020/08/21

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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.	<p>Capital Power appreciates the opportunity to provide comments to the AESO on the development of proposed amended ISO rule Section 505.2, Performance Criteria for Refund of Generating Unit Owner’s Contribution (“GUOC”). However, Capital Power can neither agree nor disagree with the proposed issues at this time. It is not clear in the Letter of Notice what changes in the 2018 ISO Tariff and Compliance Filing Application require Section 505.2 to be revised, nor is it appropriate at this time to conclude that this should be approved through an expedited rule process.</p> <p>Prior to commenting on the proposed issues, Capital Power requests that the AESO provide details on the specific changes in the 2018 ISO Tariff and Compliance Filing Application that, if approved, require Section 505.2 to be revised. This should include specifics of the processes and calculations relating to performance criteria and refunds.</p> <p>Capital Power is generally supportive of reducing regulatory burden, though it is unclear at this time what changes will be made to the methodology used to determine GUOC refund amounts, and how this will reduce regulatory burden. Capital Power requests that details be provided on how a simplified approach to determine GUOC refund amounts could reduce regulatory burden.</p>
2.	Do you agree or disagree with the potential objective or purpose of proposed amended ISO rule Section 505.2? Please comment.	<p>Capital Power can neither agree nor disagree with the proposed objective at this time. As previously noted, it is unclear what specific changes to Section 505.2 are being proposed.</p>



	Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
3.	Do you agree or disagree with the proposed form of consultation and timelines? Please comment.	<p>Capital Power does not agree with the proposed consultation steps and timeline. Capital Power does agree that consultation is required, but not with the AESO's proposal to file these changes under the provisions of the <i>Electric Utilities Act</i> for expedited ISO rules. An expedited ISO rule process eliminates the opportunity for stakeholders to provide comments during the AUC approval process and at this time, it is unclear what the changes to Section 505.2 would look like and what the impact would be to generating unit owners and market participants.</p> <p>Capital Power recommends that to facilitate the consultation process, the AESO should provide a concordance table of proposed changes. The table should:</p> <ul style="list-style-type: none"> • identify the current misalignment between the AESO Tariff and Section 505.2; • outline each proposed change to Section 505.2 demonstrating how they realign Section 505.2 with the Tariff or how regulatory burden is reduced; and • describe the need for each change, where applicable, to be considered for expedited approval. <p>Following the consultation, a determination can be made on whether an expedited ISO rule approval process is appropriate.</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.	<p>Capital Power intends on participating in all related consultation and believes that a consultation group is required because any changes to Section 505.2 stand to impact generating unit owners and market participants. The consultation group will also be necessary in addressing what, if any, potential reductions in regulatory burden could reasonably be implemented.</p>
5.	Do you have any additional comments?	Capital Power has no additional comments at this time.