

Proposed New ISO rule – Section 201.13 – Capacity Market Clearing

<b>Period of Comment:</b>	August 13, 2018	through	August 31, 2018	<b>Contact:</b>	Surendra Singh
<b>Comments From:</b>	Alberta Newsprint Company			<b>Phone:</b>	780-778-1537
<b>Date [yyyy/mm/dd]:</b>	2018/08/31			<b>Email:</b>	surendras@albertanewsprint.com

*Please provide comments relating to the subsection of the proposed 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
		<b>Applicability</b>	
1		Section 201.13 applies to:  (a) the <b>ISO</b> .	
		<b>Requirements</b>  <b>Auction Clearing</b>	
2	(1)	The <b>ISO</b> must use a clearing process that clears <b>offers</b> and <b>bids</b> , as applicable, in a manner that maximizes social surplus with consideration of the following:  (a) a lower priced <b>capacity block</b> in an <b>offer</b> will be cleared before a higher priced <b>capacity block</b> in an <b>offer</b> ;  (b) a higher priced <b>capacity block</b> in a <b>bid</b> will be cleared before a lower priced <b>capacity block</b> in a <b>bid</b> ;  (c) when multiple equivalent <b>flexible blocks</b> are submitted at the clearing price and	ANC notes that it is not clear what will occur when there is a mix of flexible and inflexible blocks. ANC suggests that flexible blocks should be favoured to incent more flexible offers and reduce the likelihood of over procurement due to inflexible blocks.

Section	Subsection	Proposed language	Stakeholder comments
		<p>result in the same social surplus, clear such equivalent <b>flexible blocks</b> on a pro-rata basis; and</p> <p>(d) when multiple equivalent <b>inflexible blocks</b> are submitted at the clearing price and result in the same social surplus, clear such equivalent <b>inflexible blocks</b> on a random basis.</p>	
2	(2)	The <b>ISO</b> may perform the clearing process more than once prior to establishing the clearing price.	
		<b>Transfer Path Limits Calculation</b>	
3		<p>The <b>ISO</b> must determine the limits, for each <b>base auction</b> or <b>rebalancing auction</b>, on each of the British Columbia transfer path, Montana transfer path, the Saskatchewan transfer path, and the combined British Columbia and Montana transfer paths by averaging the hourly limits for each of the above as follows:</p> <p>(a) for the British Columbia transfer path, for each of the 250 <b>tightest supply cushion hours</b> per year for the previous 5 years to the <b>base auction</b> or <b>rebalancing auction</b>, as applicable, by assigning a hourly limit based on the minimum of:</p> <p>(i) the hourly import <b>available transfer capability</b> for the British Columbia transfer path; or</p> <p>(ii) the long-term firm transmission service on the British Columbia transfer path.</p> <p>(b) for the Montana transfer path, for each of the 250 <b>tightest supply cushion hours</b> per year for the previous 5 years to the <b>base auction</b> or <b>rebalancing auction</b>, as applicable, by assigning a hourly limit based on the minimum of:</p> <p>(i) the hourly import <b>available transfer capability</b> for the Montana transfer path; or</p>	

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		<p>(ii) the long-term firm transmission service on the Montana transfer path.</p> <p>(c) for the Saskatchewan transfer path, for each of the 250 <b>tightest supply cushion hours</b> per year for the previous 5 years to the <b>base auction</b> or <b>rebalancing auction</b>, as applicable, by assigning a hourly limit based on the minimum of:</p> <p>(i) the hourly import <b>available transfer capability</b> for the Saskatchewan transfer path; or</p> <p>(ii) the long-term firm transmission service on the Saskatchewan transfer path.</p> <p>(d) for the combined British Columbia and Montana transfer paths, for each of the 250 <b>tightest supply cushion hours</b> per year for the previous 5 years to the <b>base auction</b> or <b>rebalancing auction</b>, as applicable, by assigning a hourly limit based on the minimum of:</p> <p>(i) the combined import <b>available transfer capability</b> for the British Columbia and Montana transfer paths prior to LSSi arming; or</p> <p>(ii) combined long-term firm transmission for the British Columbia and Montana transfer paths.</p>	
		<p><b>Consideration of Transmission Congestion Constraints and Transfer Path Limits in Clearing Process</b></p>	
4	(1)	<p>The <b>ISO</b> may, in the event that the <b>ISO</b> determines that the energy associated with an <b>offer</b> may be unable to be delivered to the <b>interconnected electric system</b> during the <b>obligation period</b> due to either a <b>transmission congestion constraint</b> or a limit on an Alberta <b>intertie</b> determined in accordance with subsection 3:</p>	

Section	Subsection	Proposed language	Stakeholder comments
		<ul style="list-style-type: none"> <li>(a) not clear the <b>offer</b>;</li> <li>(b) clear a portion of the <b>offer</b>; or</li> <li>(c) if there are multiple <b>flexible blocks</b> impacted by the same <b>transmission congestion constraint</b> or limit on an Alberta <b>intertie</b> either:               <ul style="list-style-type: none"> <li>(i) not clear the <b>flexible blocks</b>; or</li> <li>(ii) when multiple equivalent <b>flexible blocks</b> are submitted at the same price and result in the same social surplus, clear such equivalent <b>flexible blocks</b> on a pro-rata basis.</li> </ul> </li> <li>(d) if there are multiple <b>inflexible blocks</b> impacted by the same <b>transmission congestion constraint</b> or limit on an Alberta <b>intertie</b> either:               <ul style="list-style-type: none"> <li>(i) not clear the <b>inflexible blocks</b>; or</li> <li>(ii) when multiple equivalent <b>inflexible blocks</b> are submitted at the same price and result in the same social surplus, clear such equivalent <b>inflexible blocks</b> on a random basis.</li> </ul> </li> </ul>	
4	(2)	The <b>ISO</b> may clear additional <b>offers</b> for the equivalent volume of the <b>offers</b> it did not clear pursuant to subsection 4(1).	Alberta Newsprint questions whether it is necessary to clear additional offers if there is no adequacy concern due to the uncleared blocks. This is likely to result in capacity procured at above market prices for a questionable (or minimal) benefit.
4	(3)	The <b>ISO</b> must, for the additional <b>offers</b> cleared in accordance with subsection 4(2), provide an uplift payment for the difference between the <b>offer</b> price and the clearing price, if the <b>offer</b> price of such <b>offers</b> is higher than the clearing price.	

**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 the proposed new ISO rule – Section 201.13 – <i>Capacity Market Clearing</i> relates to the capacity market and why or why not	Yes 201.13 relates to the capacity market.
2	whether you agree that the proposed new ISO rule – Section 201.13 – <i>Capacity Market Clearing</i> should [or should not] be in effect for a fixed term and why or why not	It should not be in effect for a fixed term.
3	whether you understand and agree with the objective or purpose of the proposed new ISO rule – Section 201.13 – <i>Capacity Market Clearing</i> and whether, in your view, the proposed new ISO rule – Section 201.13 – <i>Capacity Market Clearing</i> meets the objective or purpose	Agreed.
4	how, in your view, the proposed new ISO rule – Section 201.13 – <i>Capacity Market Clearing</i> affects the performance of the capacity market and the electricity market	
5	your views on any analysis conducted or commissioned by the AESO supporting the proposed new ISO rule – Section 201.13 – <i>Capacity Market Clearing</i>	
6	whether you agree with the proposed new ISO rule – Section 201.13 – <i>Capacity Market Clearing</i> 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 the proposed new ISO rule – Section 201.13 – <i>Capacity Market Clearing</i>	
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	

Item #		Stakeholder comments
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 the proposed new ISO rule – Section 201.13 – Capacity Market Clearing***

Proposed New ISO rule – Section 206.1 – *Qualification of Capacity*

<b>Period of Comment:</b>	August 13, 2018	through	August 31, 2018	<b>Contact:</b>	Surendra Singh
<b>Comments From:</b>	Alberta Newsprint Company			<b>Phone:</b>	780-778-1537
<b>Date [yyyy/mm/dd]:</b>	2018/08/31			<b>Email:</b>	surendras@albertanewsprint.com

**Please provide comments relating to the subsection of the proposed 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
		<b>Applicability</b>	
1		Section 206.1 applies to: <ul style="list-style-type: none"> <li>(a) a <b>person</b> seeking to have the <b>ISO</b> qualify <b>new capacity</b> for the capacity market;</li> <li>(b) a <b>capacity market participant</b> seeking to have the <b>ISO</b> qualify <b>refurbished capacity</b> or <b>incremental capacity</b> for the capacity market; and</li> <li>(c) the <b>ISO</b>.</li> </ul>	
		<b>Requirements</b>	
		<b>Application for Qualification of Capacity</b>	
2	(1)	Each <b>person</b> or <b>capacity market participant</b> must, within the timelines prescribed by the <i>Capacity Market Auction Guidelines</i> , provide the <b>ISO</b> with a completed application including:	Alberta Newsprint is concerned that timelines and fees are described in guidelines rather than in the rule directly.



Section	Subsection	Proposed language	Stakeholder comments
		<ul style="list-style-type: none"> <li>(a) all information or documents that the <b>ISO</b> specifies; and</li> <li>(b) any applicable application fee as set out in the <i>Schedule of ISO Fees</i>.</li> </ul>	
2	(2)	The <b>ISO</b> may request additional clarification or information regarding the application or supporting documents from each <b>person</b> or <b>capacity market participant</b> .	
		<b>Declarations for Incremental Capacity and Refurbished Capacity</b>	
3	(1)	<p>A <b>capacity market participant</b> must, if it has applied to provide proposed <b>incremental capacity</b> within the timelines prescribed by the <i>Capacity Market Auction Guidelines</i>, submit to the <b>ISO</b> a declaration, in the manner specified by the <b>ISO</b>, as to whether the anticipated <b>maximum capability</b> of the asset with proposed <b>incremental capacity</b> will be either:</p> <ul style="list-style-type: none"> <li>(a) the <b>maximum capability</b> of the asset had the <b>capacity market participant</b> not applied for proposed <b>incremental capacity</b>; or</li> <li>(b) remain as the anticipated <b>maximum capability</b> accounting for the proposed <b>incremental capacity</b>,</li> </ul> <p>in the event that a <b>capacity market participant</b> fails to receive a <b>capacity commitment</b> for such asset in the <b>base auction</b> or <b>rebalancing auction</b> for some or all of the proposed <b>incremental capacity</b>.</p>	
3	(2)	<p>A <b>capacity market participant</b> must, within the timelines prescribed by the <i>Capacity Market Auction Guidelines</i> and in the manner specified by the <b>ISO</b>, submit to the <b>ISO</b> a declaration, as to whether an asset with <b>refurbished capacity</b> will:</p> <ul style="list-style-type: none"> <li>(a) permanently delist in accordance with Section 206.X of the <b>ISO rules</b>,</li> </ul>	

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		<p><i>Delisting</i>; or</p> <p>(b) continue to participate in the energy market and capacity market, in the event that a <b>capacity market participant</b> fails to receive a <b>capacity commitment</b> for such asset in the <b>base auction</b> or <b>rebalancing auction</b>.</p>	
		<p><b>Qualification of New Capacity, Incremental Capacity and Refurbished Capacity</b></p>	
4	(1)	<p>The <b>ISO</b> must, based on the information in the application and any supporting documents provided pursuant to subsection 2, be satisfied that the asset:</p> <ul style="list-style-type: none"> <li>(a) will be capable of providing energy to or reducing consumption from the <b>interconnected electric system</b>;</li> <li>(b) has a <b>uniform capacity value</b> greater than or equal to 1 MW;</li> <li>(c) will be developed, energized and commissioned in accordance with a project plan and timeline that aligns with the project milestones established by the <b>ISO</b>;</li> <li>(d) is not a <b>source asset</b> that is the subject of a renewable electricity support agreement in connection with rounds 1, 2 or 3 of the Renewable Electricity Program;</li> <li>(e) is not energy efficiency;</li> <li>(f) in the case of a load asset: <ul style="list-style-type: none"> <li>(i) can or will be able to reduce demand during the <b>obligation period</b> in a way that is measureable by the <b>ISO</b>;</li> <li>(ii) is or will be a retail or self-retail asset; and</li> <li>(iii) is not located on a site with an onsite <b>generating unit</b> or <b>aggregated generating facility</b> that is participating in the capacity market.</li> </ul> </li> <li>(g) in the case of an <b>energy storage facility</b>, is or will be capable of maintaining energy production at it <b>uniform capacity value</b> for a minimum of 4 hours;</li> <li>(h) in the case of an import asset:</li> </ul>	<p>Alberta Newsprint is concerned with the language in 4(1)(f)(iii) that appears to suggest that demand response and generation cannot exist on the same site. Alberta Newsprint currently has exactly this situation and the rationale for the prohibition is unclear. The AESO has visibility of both the demand response and generation asset and the fact that they are on the same site does not adversely affect the ability to supply capacity nor the ability for the AESO to observe performance. ANC submits that as long as the load asset and the generation asset are metered separately and can be dispatched separately both should be able to sell capacity.</p> <p>ANC requests that (f)(iii) is removed or altered to allow both load and generation resources on the same site.</p>

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		<ul style="list-style-type: none"> <li>(i) has firm transmission from the import asset to the Alberta border for the duration of the <b>obligation period</b>;</li> <li>(ii) is not participating as non-recallable capacity in a resource adequacy program of another jurisdiction; and</li> <li>(iii) will be curtailed on a pro-rata basis by the <b>balancing authority</b> of the jurisdiction in which the import asset is located in when load, which is firm, is curtailed.</li> </ul> <ul style="list-style-type: none"> <li>(i) in the case of an aggregation of assets:           <ul style="list-style-type: none"> <li>(i) has a <b>uniform capacity value</b> less than or equal to the <b>uniform capacity value</b> of the largest generating unit in Alberta;</li> <li>(ii) has or will have the appropriate metering the <b>ISO</b> specifies for each asset in the aggregation;</li> <li>(iii) is comprised of assets that are either exclusively load assets or exclusively <b>generating units</b> or <b>aggregated generating facilities</b>; and</li> <li>(iv) is not comprised of any asset that will contribute capacity individually, or as part of another aggregation, to the capacity market;</li> </ul> </li> <li>(j) in the case of <b>incremental capacity</b>, will be retrofitted in a manner that will, in the opinion of the <b>ISO</b>, increase the <b>maximum capability</b> of the asset by an amount in MW that is:           <ul style="list-style-type: none"> <li>(i) greater than or equal to 1 MW; and</li> <li>(ii) less than or equal to the greater of:               <ul style="list-style-type: none"> <li>(A) 15% of the asset's <b>maximum capability</b>; or</li> <li>(B) 40 MW above the asset's <b>maximum capability</b>.</li> </ul> </li> </ul> </li> <li>(k) in the case of <b>refurbished capacity</b>, will be retrofitted in a manner that will, in the opinion of the <b>ISO</b>, result in either:           <ul style="list-style-type: none"> <li>(i) an increase in the asset's <b>maximum capability</b> by an amount exceeding the greater of:               <ul style="list-style-type: none"> <li>(A) 15% of the asset's <b>maximum capability</b>; or</li> </ul> </li> </ul> </li> </ul>	

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		<p>(B) 40 MW above the asset's <b>maximum capability</b>; or</p> <p>(ii) a capital investment of greater than or equal to \$200 per kW of the asset's <b>maximum capability</b> multiplied by a capital cost escalation rate that is specified by the <b>ISO</b>.</p>	
4	(2)	<p>The <b>ISO</b> may, in a determination made pursuant to subsection 4(1)(k)(ii), reject any cost information submitted by the <b>capacity market participant</b> if the <b>ISO</b> determines that such costs are unreasonable.</p>	
4	(3)	<p>The <b>ISO</b> must qualify an asset with <b>new capacity, refurbished capacity or incremental capacity</b> for the capacity market if:</p> <p>(a) the application provided pursuant to subsection 2 is complete; and</p> <p>(b) the <b>ISO</b> is satisfied pursuant to subsection 4(1), as applicable.</p>	
4	(4)	<p>The <b>ISO</b> must, within the timelines prescribed by the <i>Capacity Market Auction Guidelines</i>, notify each <b>person or capacity market participant</b> as to whether the <b>new capacity, refurbished capacity or incremental capacity</b> is qualified for the capacity market.</p>	

**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 the proposed new ISO rule – Section 206.1 – <i>Qualification of Capacity</i> relates to the capacity market and why or why not	Yes 206.1 relates to the capacity market.
2	whether you agree that the proposed new ISO rule – Section 206.1 – <i>Qualification of Capacity</i> should [or should not] be in effect for a fixed term and why or why not	206.1 should not be a fixed term.
3	whether you understand and agree with the objective or purpose of the proposed new ISO rule – Section 206.1 – <i>Qualification of Capacity</i> and whether, in your view, the proposed new ISO rule – Section 206.1 – <i>Qualification of Capacity</i> meets the objective or purpose	Agreed.
4	how, in your view, the proposed new ISO rule – Section 206.1 – <i>Qualification of Capacity</i> affects the performance of the capacity market and the electricity market	
5	your views on any analysis conducted or commissioned by the AESO supporting the proposed new ISO rule – Section 206.1 – <i>Qualification of Capacity</i>	
6	whether you agree with the proposed new ISO rule – Section 206.1 – <i>Qualification of Capacity</i> taken together with all ISO rules and in light of the principle of a fair, efficient and openly competitive market	Agreed with the exception of the prohibition of demand response and generation capacity on the same site. As currently written the rule is neither fair nor efficient with respect to the capability of Alberta Newsprint.
7	whether you would suggest any alternatives to the proposed new ISO rule – Section 206.1 – <i>Qualification of Capacity</i>	As noted on 4(1)(f)(iii).

Item #		Stakeholder comments
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 the proposed new ISO rule – Section 206.1– Qualification of Capacity***

**Proposed New ISO rule – Section 206.2 – Self Supply Configurations**

<b>Period of Comment:</b>	August 13, 2018	through	August 31, 2018	<b>Contact:</b>	Surendra Singh
<b>Comments From:</b>	Alberta Newsprint Company			<b>Phone:</b>	780-778-1537
<b>Date [yyyy/mm/dd]:</b>	2018/08/31			<b>Email:</b>	surendras@albertanewsprint.com

***Please provide comments relating to the subsection of the proposed 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
		<b>Applicability</b>	
1		Section 206.2 applies to: <ul style="list-style-type: none"> <li>(a) the <b>legal owner</b> of a load asset that is served by one or more onsite <b>generating units</b> or <b>aggregated generating facilities</b>;</li> <li>(b) the City of Medicine Hat; and</li> <li>(c) the <b>ISO</b>.</li> </ul>	
		<b>Requirements</b> <b>Mandatory Requirements to Self-supply Capacity</b>	
2	(1)	The <b>legal owner</b> of a load asset that is served by one or more onsite <b>generating units</b> or <b>aggregated generating facilities</b> must self-supply <b>capacity</b> if such site is: <ul style="list-style-type: none"> <li>(a) metered on a net basis; or</li> </ul>	It is not clear what is meant by the term 'flowing energy'.



Section	Subsection	Proposed language	Stakeholder comments
		(b) is not capable of flowing energy on to the <b>interconnected electric system</b> .	
2	(2)	The City of Medicine Hat must self-supply <b>capacity</b> .	
		<b>Option to Self-supply Capacity</b>	
3		<p>The <b>legal owner</b> of a load asset that is served by one or more onsite <b>generating units</b> or <b>aggregated generating facilities</b> may choose to self-supply <b>capacity</b> if:</p> <ul style="list-style-type: none"> <li>(a) such site has a bi-directional net-interval meter;</li> <li>(b) the <b>generating units</b> or <b>aggregated generating facilities</b> are metered on a gross basis; and</li> <li>(c) the <b>generating units</b> or <b>aggregated generating facilities</b> are capable of flowing energy on to the <b>interconnected electric system</b>.</li> </ul>	<p>This rule as written is confusing as it is unclear what is required to participate as gross versus self supply. ANC requests clarity as to what a facility requires to participate gross as well as what is required for the option to participate as self supply. Is it the case that a site that is not mandatory self supply is automatically in the gross category and must meet the requirements in 3 to have the option for self supply?</p>
		<b>Application to Self-supply Capacity</b>	
4		<p>The <b>legal owner</b> of a load asset that is served by one or more onsite <b>generating units</b> or <b>aggregated generating facilities</b> and the City of Medicine Hat must provide the <b>ISO</b>, within the timelines prescribed by the <i>Capacity Market Auction Guidelines</i>, a completed application to self-supply <b>capacity</b> including all information or documents that the <b>ISO</b> specifies.</p>	
		<b>Approval to Self-supply Capacity</b>	
5		<p>The <b>ISO</b> must, within the timelines prescribed by the <i>Capacity Market Auction Guidelines</i>, approve an application to self-supply <b>capacity</b> if the site meets the criteria set out in subsections 2 or 3, as applicable.</p>	<p>ANC requests clarity that self-supply in the capacity market (or choosing to not self-supply and participate gross) has no implications for participation in the energy market or relative to the transmission tariff. In effect, arrangements that are currently in place for the energy market and transmission tariff will not be impacted.</p>

Section	Subsection	Proposed language	Stakeholder comments
		<b>Capacity from a Self-supply Configuration</b>	
6	(1)	<p>The <b>legal owner</b> of a <b>generating unit</b> or an <b>aggregated generating facility</b> in a self-supply configuration must, in the event that:</p> <ul style="list-style-type: none"> <li>(a) the <b>generating unit</b> or <b>aggregated generating facility</b> has excess <b>capacity</b> that is not serving the on-site load; and</li> <li>(b) the excess <b>capacity</b> that is not serving the on-site load has a <b>uniform capacity value</b> greater than or equal to 1 MW,</li> </ul> <p>participate in the capacity market with the excess <b>capacity</b> that is not serving the on-site load.</p>	
6	(2)	<p>The <b>legal owner</b> of a load asset in a self-supply configuration may provide <b>capacity</b> in the capacity market with the portion of the load that is not supplied by onsite generation if the <b>capacity</b> has a <b>uniform capacity value</b> greater than or equal to 1 MW.</p>	
		<b>Changes in Self-supply Status</b>	
7	(1)	<p>The <b>legal owner</b> of a load asset that is served by one or more onsite <b>generating units</b> or <b>aggregated generating facilities</b> that is required to self-supply <b>capacity</b> pursuant to subsection 2(1) may apply to the <b>ISO</b> to change its self-supply status if:</p> <ul style="list-style-type: none"> <li>(a) the <b>legal owner</b> installs a bi-directional net-interval meter at such site;</li> <li>(b) the <b>legal owner</b> changes <b>generating units</b> or <b>aggregated generating facilities</b> to be metered on a gross basis; and</li> <li>(c) the <b>generating units</b> or <b>aggregated generating facilities</b> are capable of flowing energy on to the <b>interconnected electric system</b>.</li> </ul>	<p>Please clarify if 7(1) in effect forms the requirements for participation as a gross supplier. In effect, if a site has a bi-directional net interval meter, the generation is metered gross (is revenue quality metering required or is SCADA sufficient) and an STS contract is in place (for a transmission connected asset) then that site can participate gross?</p>

Section	Subsection	Proposed language	Stakeholder comments
7	(2)	<p>The <b>legal owner</b> of a load asset that is served by one or more onsite <b>generating units</b> or <b>aggregated generating facilities</b> that elects to self-supply <b>capacity</b> pursuant to subsection 3 must self-supply <b>capacity</b> for a minimum of 4 <b>obligation periods</b> unless it can demonstrate to the <b>ISO's</b> satisfaction that physical changes to the site warrant a change in self-supply status.</p>	<p>It is not clear what the rationale to reduce flexibility for sites is intended to remedy. This requirement appears to be arbitrary and unnecessary.</p>

**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 the proposed new ISO rule – Section 206.2 – <i>Self Supply Configurations</i> relates to the capacity market and why or why not	It relates to the capacity market.
2	whether you agree that the proposed new ISO rule – Section 206.2 – <i>Self Supply Configurations</i> should [or should not] be in effect for a fixed term and why or why not	It should not be a fixed term.
3	whether you understand and agree with the objective or purpose of the proposed new ISO rule – Section 206.2 – <i>Self Supply Configurations</i> and whether, in your view, the proposed new ISO rule – Section 206.2 – <i>Self Supply Configurations</i> meets the objective or purpose	
4	how, in your view, the proposed new ISO rule – Section 206.2 – <i>Self Supply Configurations</i> affects the performance of the capacity market and the electricity market	Self-supply considerations are key for the market given the large number of industrial sites with onsite generation.
5	your views on any analysis conducted or commissioned by the AESO supporting the proposed new ISO rule – Section 206.2 – <i>Self Supply Configurations</i>	
6	whether you agree with the proposed new ISO rule – Section 206.2 – <i>Self Supply Configurations</i> 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 the proposed new ISO rule – Section 206.2 – <i>Self Supply Configurations</i>	

Item #		Stakeholder comments
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	Customers must retain flexibility to manage electricity costs with onsite generation a key option. The rule supports this ability.
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 the proposed new ISO rule – Section 206.2 – Self Supply Configurations***

**Proposed New ISO rule – Section 206.4 – Offers and Bids for the Capacity Market**

<b>Period of Comment:</b>	August 13, 2018	through	August 31, 2018	<b>Contact:</b>	Surendra Singh
<b>Comments From:</b>	Alberta Newsprint Company			<b>Phone:</b>	780-778-1537
<b>Date [yyyy/mm/dd]:</b>	2018/08/31			<b>Email:</b>	surendras@albertanewsprint.com

***Please provide comments relating to the subsection of the proposed 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
		<b>Applicability</b>	
1		Section 206.4 applies to: <ul style="list-style-type: none"> <li>(a) a <b>capacity market participant</b> with an asset that has an assigned <b>uniform capacity value</b>; and</li> <li>(b) the <b>ISO</b>.</li> </ul>	
		<b>Requirements</b>	
		<b>Obligation to Offer and Offer Content for a Base Auction</b>	
2	(1)	A <b>capacity market participant</b> must submit an <b>offer</b> for a <b>base auction</b> in respect of an asset that: <ul style="list-style-type: none"> <li>(a) has an assigned <b>uniform capacity value</b>; and</li> <li>(b) is listed opposite the <b>capacity market participant</b> on the list the <b>ISO</b> publishes pursuant to Section 201.10 of the <b>ISO rules, Capacity Market</b></li> </ul>	

Section	Subsection	Proposed language	Stakeholder comments
		<i>Participant Registration.</i>	
2	(2)	A <b>capacity market participant</b> must ensure its <b>offer</b> volume for an asset in a <b>base auction</b> equals the asset's <b>uniform capacity value</b> .	ANC requests confirmation that it will be free to select its obligation, i.e. ANC can select 'down to' any capacity it chooses and set its uniform capacity value in effect. Participation does not require the full technically achievable reduction to be offered for demand response.
2	(3)	<p>A <b>capacity market participant</b> must include in each <b>capacity block</b> in an <b>offer</b> for a <b>base auction</b>:</p> <ul style="list-style-type: none"> <li>(a) a price in \$/kW-year to the nearest cent per kW-year which, subject to Section 206.7, of the <b>ISO rules</b>, <i>Capacity Market Mitigation</i>, is: <ul style="list-style-type: none"> <li>(i) greater than or equal to \$0/kW-year; and</li> <li>(ii) less than or equal to the maximum price established by the demand curve; and</li> </ul> </li> <li>(b) a quantity in MW that is greater than or equal to than 1 MW.</li> </ul>	
2	(4)	The <b>ISO</b> must, if a <b>capacity market participant</b> does not submit an <b>offer</b> in accordance with subsections 2(1), 2(2) or 2(3), assign an <b>offer</b> price of \$0/kW-year for the <b>offer</b> volume equal to the asset's assigned <b>uniform capacity value</b> .	
		<b>Obligation to Offer and Offer Content for a Rebalancing Auction</b>	
3	(1)	<p>A <b>capacity market participant</b> must submit an <b>offer</b> for a <b>rebalancing auction</b> in respect of an asset that:</p> <ul style="list-style-type: none"> <li>(a) has an assigned <b>uniform capacity value</b> greater than the <b>capacity commitment</b>; and</li> </ul>	ANC requests clarity on rebalancing auction commitments. If a participant sells its full capacity value in the Base Auction, and that volume is reduced marginally in subsequent years, is there an obligation to repurchase. For example, if ANC has a reduction of 1 MW in its generator capacity, is it obligated to purchase that 1 MW or will there be a minimum



Section	Subsection	Proposed language	Stakeholder comments
		(b) is listed opposite the <b>capacity market participant</b> on the list the <b>ISO</b> publishes pursuant to Section 201.10 of the <b>ISO rules</b> , <i>Capacity Market Participant Registration</i> .	threshold before this is required?
3	(2)	A <b>capacity market participant</b> must ensure its <b>offer</b> volume for an asset in a <b>rebalancing auction</b> equals the difference between the asset's <b>uniform capacity value</b> and its <b>capacity commitment</b> .	
3	(3)	A <b>capacity market participant</b> must include in each <b>capacity block</b> in an <b>offer</b> for a <b>rebalancing auction</b> :  (a) a price in \$/kW-year to the nearest cent per kW-year which is:  (i) greater than or equal to \$0/kW-year; and  (ii) less than or equal to the maximum price established by the demand curve; and  (b) a quantity in MW that is equal to or greater than 1 MW.	
3	(4)	The <b>ISO</b> must, if a <b>capacity market participant</b> does not submit an <b>offer</b> in accordance with subsections 3(1), 3(2) or 3(3), assign an <b>offer</b> price of \$0/kW-year for the <b>offer</b> volume equal to the difference between the asset's <b>uniform capacity value</b> and its <b>capacity commitment</b> .	
		<b>Designation of Flexible Blocks or Inflexible Blocks for Offers</b>	
4	(1)	A <b>capacity market participant</b> must, except for an asset with <b>incremental capacity</b> , designate in an <b>offer</b> :	

Section	Subsection	Proposed language	Stakeholder comments
		<ul style="list-style-type: none"> <li>(a) the lowest priced <b>capacity block</b> as a <b>flexible block</b> or <b>inflexible block</b>; and</li> <li>(b) all other <b>capacity blocks</b> as <b>flexible blocks</b>.</li> </ul>	
4	(2)	<p>A <b>capacity market participant</b> must, for an asset with <b>incremental capacity</b>, designate in an <b>offer</b> all <b>capacity blocks</b> as <b>flexible blocks</b> except in the following circumstances:</p> <ul style="list-style-type: none"> <li>(a) the lowest priced <b>capacity block</b> may be designated as an <b>inflexible block</b>; or</li> <li>(b) in the event that: <ul style="list-style-type: none"> <li>(i) the lowest priced <b>capacity block</b> contains only <b>incremental capacity</b>;</li> <li>(ii) there is a <b>capacity block</b> that contains only non-<b>incremental capacity</b>; and</li> <li>(iii) there is no lower priced <b>capacity block</b> that contains both <b>incremental capacity</b> and non-<b>incremental capacity</b> than the lowest priced <b>capacity block</b> that contains no <b>incremental capacity</b>,</li> </ul> <p>the lowest priced <b>capacity block</b> containing only non-<b>incremental capacity</b> may be designated as an <b>inflexible block</b>, as demonstrated in Appendix 1.</p> </li> <li>(c) in the event that: <ul style="list-style-type: none"> <li>(i) the lowest priced <b>capacity block</b> contains only non-<b>incremental capacity</b>;</li> <li>(ii) there is a <b>capacity block</b> that contains only <b>incremental capacity</b>; and</li> <li>(iii) there is no lower priced <b>capacity block</b> that contains both <b>incremental</b></li> </ul> </li> </ul>	

Section	Subsection	Proposed language	Stakeholder comments
		<p><b>capacity</b> and non-<b>incremental capacity</b> than the lowest priced <b>capacity block</b> that contains only <b>incremental capacity</b>,</p> <p>the lowest priced <b>capacity block</b> containing only <b>incremental capacity</b> may be designated as an <b>inflexible block</b>, as demonstrated in Appendix 1.</p>	
		<p><b>Additional Offer Content for Incremental Capacity</b></p>	
5		<p>A <b>capacity market participant</b> must, for an asset with <b>incremental capacity</b>, include in each <b>capacity block</b> in an <b>offer</b> a declaration of the quantity in MW within a <b>capacity block</b> that is <b>incremental capacity</b>.</p>	
		<p><b>Additional Offer Content for Refurbished Capacity</b></p>	
6	(1)	<p>A <b>capacity market participant</b> must, that has failed the market power screen in accordance with Section 206.7, of the <b>ISO rules</b>, <i>Capacity Market Mitigation</i>, for an asset with <b>refurbished capacity</b>, submit:</p> <ul style="list-style-type: none"> <li>(a) a first <b>offer</b> comprised of one <b>capacity block</b> that is an <b>inflexible block</b> for an asset with <b>refurbished capacity</b> qualified by the <b>ISO</b>; and</li> <li>(b) a second <b>offer</b> based on the <b>offer</b> the <b>capacity market participant</b> would have submitted had the <b>ISO</b> not qualified the <b>refurbished capacity</b>,</li> </ul> <p>unless the <b>capacity market participant</b> declared to permanently delist the <b>refurbished capacity</b> pursuant to Section 206.1 of the <b>ISO rules</b>, <i>Qualification of Capacity</i> in the event it fails to obtain a <b>capacity commitment</b>.</p>	
6	(2)	<p>A <b>capacity market participant</b> may, if it has submitted an <b>offer</b> in accordance with subsection 6(1) and the <b>offer</b> that is referred to in subsection 6(1)(a) does not clear,</p>	

Section	Subsection	Proposed language	Stakeholder comments
		submit in the next <b>base auction</b> : <ul style="list-style-type: none"> <li data-bbox="505 378 1473 451">(a) an <b>offer</b> comprised of one <b>capacity block</b> that is an <b>inflexible block</b> for an asset with <b>refurbished capacity</b> qualified by the <b>ISO</b>; or</li> <li data-bbox="505 483 1446 557">(b) an <b>offer</b> based on the <b>offer</b> the <b>capacity market participant</b> would have submitted had the <b>ISO</b> not qualified the <b>refurbished capacity</b>.</li> </ul>	
6	(3)	A <b>capacity market participant</b> must, in the event that the <b>capacity market participant</b> submitted an <b>offer</b> in accordance with subsection 6(2)(a) and the <b>offer</b> did not clear, permanently delist the asset.	
6	(4)	A <b>capacity market participant</b> must ensure that an <b>offer</b> has not been submitted for the asset in the manner described in subsection 6(1) prior to submitting an <b>offer</b> in accordance with subsection 6(1).	
		<b>Bid Content</b>	
7	(1)	A <b>capacity market participant</b> with a <b>capacity commitment</b> may submit a <b>bid</b> in a <b>rebalancing auction</b> : <ul style="list-style-type: none"> <li data-bbox="505 1073 1454 1146">(a) for a quantity in MW that is equal to or greater than 1 MW and less than or equal to the <b>capacity commitment</b>; and</li> <li data-bbox="505 1179 1489 1252">(b) that is priced at a price in \$/kW-year to the nearest cent per kW-year which is greater than or equal to \$0/kW-year.</li> </ul>	
7	(2)	A <b>capacity market participant</b> with a <b>capacity commitment</b> must submit a <b>bid</b> , priced at \$0.01/kW-year above the maximum price established by the demand curve, in accordance with the following:	

Section	Subsection	Proposed language	Stakeholder comments
		<p>(a) if the asset’s assigned <b>uniform capacity value</b> for the last <b>rebalancing auction</b> is lower than its <b>capacity commitment</b>, the <b>capacity market participant</b> must submit a <b>bid</b> for the difference between the <b>capacity commitment</b> and the assigned <b>uniform capacity value</b>;</p> <p>(b) subject to subsection 7(2)(d), if the <b>ISO</b> determines, before the first <b>rebalancing auction</b>, that an asset is unable to meet the milestone requirements in accordance with Section 206.5 of the <b>ISO rules, Forward Period Requirements</b>, a <b>capacity market participant</b> must submit a <b>bid</b> equal to its entire <b>capacity commitment</b> in the first <b>rebalancing auction</b>;</p> <p>(c) subject to subsection 7(2)(d), if the <b>ISO</b> determines, before the last <b>rebalancing auction</b>, that an asset is unable to meet the milestone requirements in accordance with Section 206.5 of the <b>ISO rules, Forward Period Requirements</b>, a <b>capacity market participant</b> must submit a <b>bid</b> equal to its entire <b>capacity commitment</b> in the last <b>rebalancing auction</b>; or</p> <p>(d) if the <b>ISO</b> determines, before the last <b>rebalancing auction</b>, that an aggregation of load assets is unable to meet the milestone requirements in accordance with Section 206.5 of the <b>ISO rules, Forward Period Requirements</b>, a <b>capacity market participant</b> must submit a <b>bid</b> for the difference between the <b>capacity commitment</b> and the assigned <b>uniform capacity value</b> for the last <b>rebalancing auction</b>.</p>	
7	(3)	<p>The <b>ISO</b> must, if a <b>capacity market participant</b> does not submit a <b>bid</b> in accordance with subsection 7(2), assign a <b>bid</b> price of \$0.01/kW-year above the maximum price established by the demand curve for the <b>bid</b> volume required in subsection 7(2).</p>	

Section	Subsection	Proposed language	Stakeholder comments
		<b>Submission of Offer and Bid for the Same Asset in a Rebalancing Auction</b>	
8		A <b>capacity market participant</b> that submits an <b>offer</b> and <b>bid</b> for the same asset in a <b>rebalancing auction</b> must price the <b>capacity blocks</b> such that the highest priced <b>capacity block</b> for the <b>bid</b> is less than the lowest priced <b>capacity block</b> for the <b>offer</b> .	
		<b>Designation of Flexible Blocks or Inflexible Blocks for Bids</b>	
9		A <b>capacity market participant</b> must designate in a bid: <ul style="list-style-type: none"> <li>(a) the lowest priced <b>capacity block</b> as a <b>flexible block</b> or <b>inflexible block</b>; and</li> <li>(b) all other <b>capacity blocks</b> as <b>flexible blocks</b>.</li> </ul>	
		<b>Offering Window</b>	
10	(1)	The <b>ISO</b> must specify the offering window for a <b>base auction</b> or <b>rebalancing auction</b> in the <i>Capacity Market Auction Guidelines</i> .	
10	(2)	The <b>ISO</b> may change or extend the offering window in the event of system unavailability and the <b>ISO</b> determines that such unavailability warrants a change or extension to the offering window.	
10	(3)	The <b>ISO</b> must notify <b>capacity market participants</b> of any change or extension to an offering window made pursuant to subsection 10(2).	
10	(4)	A <b>capacity market participant</b> must submit an <b>offer</b> or <b>bid</b> during the offering window.	
		<b>Offer Submission Methods</b>	
11		A <b>capacity market participant</b> must submit an <b>offer</b> or <b>bid</b> for a <b>base auction</b> or <b>rebalancing auction</b> in a manner the <b>ISO</b> determines.	



**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 the proposed new ISO rule – Section 206.4 – <i>Offers and Bids for the Capacity Market</i> relates to the capacity market and why or why not	Rule 206.4 relates to the capacity market.
2	whether you agree that the proposed new ISO rule – Section 206.4 – <i>Offers and Bids for the Capacity Market</i> should [or should not] be in effect for a fixed term and why or why not	It should not be in place for a fixed term.
3	whether you understand and agree with the objective or purpose of the proposed new ISO rule – Section 206.4 – <i>Offers and Bids for the Capacity Market</i> and whether, in your view, the proposed new ISO rule – Section 206.4 – <i>Offers and Bids for the Capacity Market</i> meets the objective or purpose	
4	how, in your view, the proposed new ISO rule – Section 206.4 – <i>Offers and Bids for the Capacity Market</i> affects the performance of the capacity market and the electricity market	
5	your views on any analysis conducted or commissioned by the AESO supporting the proposed new ISO rule – Section 206.4 – <i>Offers and Bids for the Capacity Market</i>	
6	whether you agree with the proposed new ISO rule – Section 206.4 – <i>Offers and Bids for the Capacity Market</i> taken together with all ISO rules and in light of the principle of a fair, efficient and openly competitive market	



Item #		Stakeholder comments
7	whether you would suggest any alternatives to the proposed new ISO rule – Section 206.4 – <i>Offers and Bids for the Capacity Market</i>	
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 the proposed new ISO rule – Section 206.4 – Offers and Bids for the Capacity Market***

**Proposed New ISO rule – Section 206.6 – *Base Auction and Rebalancing Auction***

<b>Period of Comment:</b>	August 13, 2018	through	August 31, 2018	<b>Contact:</b>	Surendra Singh
<b>Comments From:</b>	Alberta Newsprint Company			<b>Phone:</b>	780-778-1537
<b>Date [yyyy/mm/dd]:</b>	2018/08/31			<b>Email:</b>	surendras@albertanewsprint.com

***Please provide comments relating to the subsection of the proposed 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
		<b>Applicability</b>	
1		Section 206.6 applies to:  (a) the <b>ISO</b> .	
		<b>Requirements</b>  <b>Base Auction Timeline</b>	
2	(1)	The <b>ISO</b> must conclude a <b>base auction</b> no later than 36 <b>months</b> prior to the start of the <b>obligation period</b> .	This should state as near as possible to 36 months. Discretion is not required.
2	(2)	The <b>ISO</b> must:  (a) notwithstanding subsection 2(1), conclude a <b>base auction</b> for the first 3 <b>obligation periods</b> in accordance with the timelines established in the <i>Capacity Market Auction Guidelines</i> ; and  (b) remove this subsection 2(2) on or about the <b>day</b> the <b>base auction</b> for the third	

Section	Subsection	Proposed language	Stakeholder comments
		<p><b>obligation period</b> is concluded.</p>	
		<p><b>Rebalancing Auction Timeline</b></p>	
3	(1)	<p>The <b>ISO</b> must, subject to subsection 3(2), conclude two rebalancing <b>auctions</b> at no later than 18 <b>months</b> and 3 <b>months</b>, respectively, prior to the start of the <b>obligation period</b>.</p>	<p>This should state as near as possible to 18 months and 3 months. Discretion is not required.</p>
3	(2)	<p>The <b>ISO</b> must:</p> <ul style="list-style-type: none"> <li>(a) notwithstanding subsection 3(1), conclude one <b>rebalancing auction</b> at no later than 3 <b>months</b> prior to the start of the <b>obligation periods</b> for the first 3 <b>obligation periods</b>; and</li> <li>(b) remove this subsection 3(2) on or about the day the <b>rebalancing auction</b> for the third <b>obligation period</b> is concluded.</li> </ul>	
		<p><b>Publication of Capacity Market Auction Guidelines</b></p>	
4		<p>The <b>ISO</b> must publish the <i>Capacity Market Auction Guidelines</i> prior to each <b>base auction</b> and <b>rebalancing auction</b>.</p>	
		<p><b>Sealed-bid, Single-round Base Auction and Rebalancing Auction</b></p>	
5		<p>The <b>ISO</b> must, for each <b>base auction</b> and <b>rebalancing auction</b>, use a sealed-bid, single-round auction design to establish a single clearing price.</p>	
		<p><b>Auction Results</b></p>	
6	(1)	<p>The <b>ISO</b> must, following a <b>base auction</b> and <b>rebalancing auction</b>, notify the <b>capacity market participant</b> of its <b>capacity commitment</b> by asset.</p>	
6	(2)	<p>The <b>ISO</b> must, as soon as practicable following a <b>base auction</b> and <b>rebalancing auction</b>,</p>	<p>Total AC of resources with capacity commitments should also be included.</p>

Section	Subsection	Proposed language	Stakeholder comments
		<p>publish the results of the <b>base auction</b> or <b>rebalancing auction</b>, including:</p> <ul style="list-style-type: none"> <li>(a) the clearing price;</li> <li>(b) the total <b>capacity</b> procured;</li> <li>(c) the total <b>capacity</b> procured by technology type;</li> <li>(d) the total <b>capacity</b> procured from assets associated with an <b>offer</b> for <b>new capacity, incremental capacity</b> and <b>refurbished capacity</b>; and</li> <li>(e) for the last <b>rebalancing auction</b> for an <b>obligation period</b>, a list of each asset subject to a <b>capacity commitment</b>.</li> </ul>	<p>Assets in the market without a capacity obligation should also be noted to facilitate asset substitution.</p>

**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 the proposed new ISO rule – Section 206.6 – <i>Base Auction and Rebalancing Auction</i> relates to the capacity market and why or why not	It relates to the capacity market.
2	whether you agree that the proposed new ISO rule – Section 206.6 – <i>Base Auction and Rebalancing Auction</i> should [or should not] be in effect for a fixed term and why or why not	It should not be for a fixed term.
3	whether you understand and agree with the objective or purpose of the proposed new ISO rule – Section 206.6 – <i>Base Auction and Rebalancing Auction</i> and whether, in your view, the proposed new ISO rule – Section 206.6 – <i>Base Auction and Rebalancing Auction</i> meets the objective or purpose	
4	how, in your view, the proposed new ISO rule – Section 206.6 – <i>Base Auction and Rebalancing Auction</i> affects the performance of the capacity market and the electricity market	
5	your views on any analysis conducted or commissioned by the AESO supporting the proposed new ISO rule – Section 206.6 – <i>Base Auction and Rebalancing Auction</i>	
6	whether you agree with the proposed new ISO rule – Section 206.6 – <i>Base Auction and Rebalancing Auction</i> taken together with all ISO rules and in light of the principle of a fair, efficient and openly competitive market	

Item #		Stakeholder comments
7	whether you would suggest any alternatives to the proposed new ISO rule – Section 206.6 – <i>Base Auction and Rebalancing Auction</i>	
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 the proposed new ISO rule – Section 206.6 – Base Auction and Rebalancing Auction***



**Proposed Amended ISO rule – Section 301.2 ISO Directives**

<b>Period of Comment:</b>	August 13, 2018	through	August 31, 2018	<b>Contact:</b>	Surendra Singh
<b>Comments From:</b>	Alberta Newsprint Company			<b>Phone:</b>	780-778-1537
<b>Date [yyyy/mm/dd]:</b>	2018/08/31			<b>Email:</b>	surendras@albertanewsprint.com

***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
		<b>Directives the ISO Issues</b>	
2	(1)	<p>The <b>ISO</b> may issue a <b>directive</b> to an <b>electricity market participant</b>, including a <b>directive</b> to:</p> <ul style="list-style-type: none"> <li>(a) increase or decrease the <b>real power</b> or <b>reactive power</b> output, or both of them, from a facility;</li> <li>(b) increase or decrease the <b>real power</b> consumption at a load asset;</li> <li>(c) shut down or start up a facility; and</li> <li>(d) switch <b>transmission system</b> elements, alter <b>planned outage</b> or maintenance schedules, or load shed.</li> </ul>	ANC supports the AESO indication during the session that a directive to increase real power consumption at a facility is not appropriate.
		<b>Acknowledging Directives</b>	
		An <b>electricity market participant</b> must acknowledge receipt of a <b>directive</b> :	

Section	Subsection	Proposed language	Stakeholder comments
		<p>(a) in the case of an automated message and unless the <b>electricity market participant</b> has notified the <b>ISO</b> of an unavailability in accordance with subsection 4(1) by responding via the Automated Dispatch and Messaging System within 2 minutes; and</p> <p>(b) in the case of a voice <b>directive</b>, by repeating the <b>directive</b> to the <b>ISO</b>.</p>	

**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 301.2 <i>ISO Directives</i> relates to the capacity market and why or why not	
2	whether you agree that amended ISO rule – Section 301.2 <i>ISO Directives</i> 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 301.2 <i>ISO Directives</i> and whether, in your view, Section 301.2 <i>ISO Directives</i> meets the objective or purpose	
4	how, in your view, amended ISO rule – Section 301.2 <i>ISO Directives</i> 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 301.2 <i>ISO Directives</i>	
6	whether you agree with amended ISO rule – Section 301.2 <i>ISO Directives</i> 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 301.2 <i>ISO Directives</i>	

Item #		Stakeholder comments
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 301.2 ISO Directives***