

Stakeholder Comments and AESO Replies Matrix



Proposed New Section 201.10 of the ISO Rules, *Capacity Market Participant Registration*

Date of Request for Comment:	October 26, 2018
Period of Comment:	October 26, 2018 through November 14, 2018

Stakeholder Comments and/or Proposed Alternative Rule Wording	AESO Replies
<p>Capacity Market Registration Subsection 2</p>	
<p><u>Alberta Federation of Rural Electrification Associations (“AFREA”)</u></p> <p>The ISO rules do not seem to mandate that all assets must offer their full output into an auction or that all assets of all pool participants must do so. If a pool participant has multiple assets it may transact only say one asset in an auction and may register as a capacity market participant to do so the way the rules are written now. If you wish to require all assets in to offer in the auctions, then this clause or another needs to make that very clear. If this is not the intent then it should similarly be made clear and explain why. Can you point us to where the rules require that all assets offer their capacity into all capacity market auctions?</p>	<p>A person is required to register one capacity market participant for each asset: (i) after such asset has been qualified by the AESO to participate in the capacity market in accordance with Proposed Section 206.1, <i>Qualification of Capacity</i>; or (ii) if such asset is a generating pool asset that has a maximum capability greater than or equal to 1 MW. The AESO will assess uniform capacity values for all registered capacity market participants and assign a uniform capacity value to a capacity market participant where the value is 1 MW or greater.</p> <p>Under Proposed Section 206.4, <i>Offers and Bids for Capacity</i> all assets that are assigned a uniform capacity value by the AESO must offer the full uniform capacity value into the respective capacity auction. Uniform capacity values are based on the methodologies in Proposed Section 206.3, <i>Uniform Capacity Value Determination</i>.</p>
<p><u>ATCO Electricity Generation (“ATCO”)</u></p> <p>As submitted previously, ATCO strongly believes that the AESO must specify the relative timelines in the applicable rules because this is authoritative information. The exact dates for a specific auction can be published prior to each auction in the Capacity Market Auction Guidelines for ease of reference. The Capacity Market Auction Guidelines must not have the borrowed authority given to it from the current drafts of the ISO Rules; the Capacity Market Auction Guidelines is an information document and should only serve to clarify the requirement (i.e. timeline) as detailed in the ISO Rule. It is inappropriate to have the Capacity Market Auction Guidelines convey authoritative information without the oversight akin to an</p>	<p>Please see the AESO’s reply to ATCO’s comments regarding subsection 4 in the AESO’s Replies to Proposed Section 206.6, <i>Base Auctions and Rebalancing Auctions</i> matrix.</p>

Stakeholder Comments and/or Proposed Alternative Rule Wording	AESO Replies
ISO Rule.	
<p><u>Capital Power Corporation (“Capital Power”)</u></p> <p>Subsection 2 - the timelines and information requirements to register as a capacity market participant remain unclear and should be specified in the rule. The information requirements that a capacity market participant must provide the ISO in the first instance regarding its capacity market participant registration, its agents and any asset listed opposite to it on the ISO list, and the timelines for such must be specified (i.e. listed) in the rule.</p>	<p>Please see the AESO's reply to ATCO's comment on subsection 2 above.</p>
<p>ISO Requirement to Maintain Lists</p> <p>Subsection 3</p>	
<p><u>Alberta Federation of Rural Electrification Associations (“AFREA”)</u></p> <p>3 The ISO must maintain and make available on the AESO website, one or more lists containing up to date information on the capacity market participants, any agents and associated assets.</p>	<p>The AESO does not agree with AFREA's recommended change.</p>

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

Item #		Stakeholder comments	AESO Replies
1	whether you agree that Section 201.10 of the ISO Rules, <i>Capacity Market Participant Registration</i> relates to the capacity market and why or why not	<p><u>Alberta Federation of Rural Electrification Associations (“AFREA”)</u> <u>See below.</u></p> <p><u>Capital Power Corporation (“Capital Power”)</u> Capital Power agrees that the proposed rule relates to the capacity market.</p>	<p>Please see the AESO’s reply to AFREA’s comment in Item #10 below.</p> <p>The AESO acknowledges Capital Power’s comment.</p>
2	whether you agree that Section 201.10 of the ISO Rules, <i>Capacity Market Participant Registration</i> should or should not be in effect for a fixed term and why or why not	<p><u>Alberta Federation of Rural Electrification Associations (“AFREA”)</u> <u>See below.</u></p> <p><u>Capital Power Corporation (“Capital Power”)</u> Capital Power does not see any rationale for prescribing a fixed term for the proposed rule and as such believes that the proposed rule should not be in effect for a fixed term. This will provide needed certainty to market participants regarding the longevity of the capacity market rules and design.</p>	<p>Please see the AESO’s reply to AFREA’s comment in Item #10 below.</p> <p>The AESO acknowledges Capital Power’s comment.</p>
3	whether you understand and agree with the objective or purpose of Section 201.10 of the ISO Rules, <i>Capacity Market Participant Registration</i> and whether, in your view, Section 201.10 of the ISO Rules, <i>Capacity Market Participant Registration</i> meets the objective or purpose	<p><u>Alberta Federation of Rural Electrification Associations (“AFREA”)</u> <u>See below.</u></p> <p><u>Capital Power Corporation (“Capital Power”)</u> Capital Power has no comments at this time.</p>	<p>Please see the AESO’s reply to AFREA’s comment in Item #10 below.</p>
4	how, in your view, Section 201.10 of the ISO Rules, <i>Capacity Market Participant Registration</i> affects the performance of the capacity market	<p><u>Alberta Federation of Rural Electrification Associations (“AFREA”)</u> <u>See below.</u></p>	<p>Please see the AESO’s reply to AFREA’s comment in Item #10 below.</p>

	and the electricity market	<u>Capital Power Corporation (“Capital Power”)</u> Capital Power has no comments at this time.	
5	your views on any analysis conducted or commissioned by the AESO supporting Section 201.10 of the ISO Rules, <i>Capacity Market Participant Registration</i>	<u>Alberta Federation of Rural Electrification Associations (“AFREA”)</u> <u>See below.</u>	Please see the AESO’s reply to AFREA’s comment in Item #10 below.
		<u>Capital Power Corporation (“Capital Power”)</u> Capital Power is not aware of any analysis conducted or commissioned by the AESO supporting the proposed rule and as such has no comments at this time.	
6	whether you agree with Section 201.10 of the ISO Rules, <i>Capacity Market Participant Registration</i> taken together with all ISO rules and in light of the principle of a fair, efficient and openly competitive market	<u>Alberta Federation of Rural Electrification Associations (“AFREA”)</u> <u>See below.</u>	Please see the AESO’s reply to AFREA’s comment in Item #10 below.
		<u>Capital Power Corporation (“Capital Power”)</u> Capital Power has no comments at this time.	
7	whether you would suggest any alternatives to Section 201.10 of the ISO Rules, <i>Capacity Market Participant Registration</i>	<u>Alberta Federation of Rural Electrification Associations (“AFREA”)</u> <u>See below.</u>	Please see the AESO’s reply to AFREA’s comment in Item #10 below.
		<u>Capital Power Corporation (“Capital Power”)</u> Capital Power has no comments at this time.	
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	<u>Alberta Federation of Rural Electrification Associations (“AFREA”)</u> <u>See below.</u>	Please see the AESO’s reply to AFREA’s comment in Item #10 below.
		<u>Capital Power Corporation (“Capital Power”)</u> Capital Power has no comments at this time.	

9	whether you agree that the proposed provisional rule supports the public interest and why or why not	<u>Alberta Federation of Rural Electrification Associations (“AFREA”)</u> <u>See below.</u>	Please see the AESO’s reply to AFREA’s comment in Item #10 below.
		<u>Capital Power Corporation (“Capital Power”)</u> Capital Power has no comments at this time.	
10	whether you have any additional comments	<u>Alberta Federation of Rural Electrification Associations (“AFREA”)</u> AFREA continues to review the voluminous comments from other stakeholders and, as such, refrains from any final position on this proposed rule. AFREA reserves the right to comment in further proceedings or processes about this or other ISO rules, and its impact on consumers in general and REA members specifically. Where applicable, AFREA comments upon the rationale of its changes which, in its view clarify the rule, align it more closely to the public interest, provide for greater reliability at a more reasonable cost, clarify the implementation of the capacity market, or a combination therein. In AFREA’s view, the public interest includes a balance between reliable supply of electricity with a reasonable cost to consumers.	The AESO acknowledges AFREA’s comment.
		<u>Capital Power Corporation (“Capital Power”)</u> Capital Power has no further comments at this time.	