

Stakeholder Comments and AESO Replies Matrix



Proposed New Section 201.11 of the ISO Rules, *Appointment of Agent for the Capacity Market*

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>Appointment of Agent Subsection 2(1)</p>	
<p><u>Capital Power Corporation (“Capital Power”)</u> Subsection 2(1) - further details are required regarding how a capacity market may appoint an agent to act on its behalf and the information requirements for doing so. Capital Power remains concerned that the language “in the manner the ISO specifies” is too broad and does not provide a clear expectation or direction to market participants. This lack of clarity creates potential compliance risks for market participants. Capital Power recommends that the rule clearly outline the process and information requirements to appoint an agent to act on behalf of the capacity market participant as opposed to deferring to “the manner the ISO specifies,” particularly in the absence of any reference to another rule or guidelines.</p>	<p>The process for appointing an agent in the capacity market will be similar to the process for appointing an agent in the energy market. The purpose of the wording in Proposed Section 201.11 is to require the applicant and nominee to fill out a standard form available on the AESO website and, within that form, make individual and joint representations, including representations relating to the scope of the relationship and information sharing arrangements.</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 201.11 of the ISO Rules, <i>Appointment of Agent for the Capacity Market</i> relates to the capacity market and why or why not	<u>Capital Power Corporation (“Capital Power”)</u> Capital Power agrees that the proposed rule relates to the capacity market.	The AESO acknowledges Capital Power’s comment.
2	whether you agree that Section 201.11 of the ISO Rules, <i>Appointment of Agent for the Capacity Market</i> should or should not be in effect for a fixed term and why or why not	<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.	The AESO acknowledges Capital Power’s comment.
3	whether you understand and agree with the objective or purpose of Section 201.11 of the ISO Rules, <i>Appointment of Agent for the Capacity Market</i> and whether, in your view, Section 201.11 of the ISO Rules, <i>Appointment of Agent for the Capacity Market</i> meets the objective or purpose	<u>Capital Power Corporation (“Capital Power”)</u> Capital Power has no comments at this time.	
4	how, in your view, Section 201.11 of the ISO Rules, <i>Appointment of Agent for the Capacity Market</i> affects the performance of the capacity market 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 201.11 of the ISO Rules, <i>Appointment of Agent for the Capacity Market</i>	<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 201.11 of the ISO Rules, <i>Appointment of Agent 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	<u>Capital Power Corporation (“Capital Power”)</u> Capital Power has no comments at this time.	
7	whether you would suggest any alternatives to Section 201.11 of the ISO Rules, <i>Appointment of Agent for the Capacity Market</i>	<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>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>Capital Power Corporation (“Capital Power”)</u> Capital Power has no comments at this time.	
10	whether you have any additional comments	<u>Capital Power Corporation (“Capital Power”)</u> Capital Power has no further comments at this time.	