

# Stakeholder Comments and AESO Replies Matrix



## Proposed New Section 201.13 of the ISO Rules, *Capacity Market Clearing*

<b>Date of Request for Comment:</b>	December 18, 2019		
<b>Period of Comment:</b>	December 18, 2019	through	January 10, 2019

Stakeholder Comments and/or Proposed Alternative Rule Wording	AESO Replies
<b>General Comments</b>	
<p><u>Capital Power Corporation (“Capital Power”)</u></p> <p>Capital Power previously provided comments to the AESO on September 28, 2018 regarding Section 201.13 and the AESO’s proposed process for clearing capacity impacted by potential transmission constraints. Capital Power will not reiterate those comments here. The comments that follow focus on amendments made to Section 201.13 since its last release.</p> <p>It remains Capital Power’s expectation that internal transmission constraints with the potential to limit <b>delivery of cleared</b> capacity will be an infrequent occurrence in the capacity market as the three-year forward period will provide the AESO with ample time to identify, plan and make arrangements to resolve potential transmission constraints prior to the delivery year. Situations where transmission constraints impacting delivery of capacity cannot be avoided must be managed in a manner that is clear and transparent to all market participants and ensures a level playing field.</p>	<p>The constrained clearing methodology in subsection 6(1) is intended to ensure that the electric energy associated with any capacity procured is capable of being delivered to the transmission system.</p> <p>As part of the constrained clearing methodology in subsection 6(1), the AESO assesses whether congestion is expected to arise during the obligation period based on credible scenarios where all transmission facilities are in service while maintaining reliable operation for credible contingencies.</p> <p>Having regard to the AESO’s mandate to plan and arrange for a transmission system that is substantially congestion-free, it is expected that constraints impacting an existing asset’s ability to deliver electric energy to the transmission system will be rare. However, in the rare event that such a constraint cannot be remedied prior to the obligation period, proposed Section 201.13 identifies how additional capacity resources will be procured if all the volumes cleared pursuant to the unconstrained clearing methodology are not expected to have congestion-free access to the transmission system.</p>
<b>Clearing to Set Clearing Price and Target Volume</b>	
<b>Section 3(1)</b>	
<p><u>Capital Power Corporation (“Capital Power”)</u></p> <p><b>3(1)</b> The <b>ISO</b> must, using the unconstrained clearing methodology in subsection 5, establish the clearing price for a <b>base auction</b> or <b>rebalancing auction</b> at the point on the final demand</p>	<p>The AESO does not agree with the change proposed by Capital Power. The application of the unconstrained methodology in subsection 5 establishes an unconstrained clearing price, which is set at the clearing price for the auction. The AESO is of the view that the interaction between subsection 3(1)</p>

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<p>curve established in accordance with Section 207.4 of the <b>ISO rules</b>, <i>Shape of the Demand Curve</i>:</p> <ul style="list-style-type: none"> <li>(a) that intersects with the <b>unconstrained</b> supply curve; or</li> <li>(b) when all the <b>unconstrained</b> cleared <b>offers</b> are below the final demand curve, that corresponds to the price above the volume of the last cleared <b>offer</b> on the <b>unconstrained</b> supply curve.</li> </ul> <p>Subsection 3(1) states the ISO must establish the clearing price for a base or rebalancing auction using the unconstrained clearing methodology in subsection 5. Capital Power recommends adding explicit language to subsection 3(1) to reflect that the clearing price established is unconstrained.</p>	<p>and 5(1) is clear.</p>
<p><b>Clearing to Establish Capacity Commitments</b></p> <p><b>Section 4(1)</b></p>	
<p><u>The Cogeneration Working Group (“CWG”)</u></p> <p>4(1) The ISO must establish capacity commitments for a base auction or rebalancing auction based on the volumes from <b>capacity blocks</b> that are cleared in accordance with the following process:</p> <ul style="list-style-type: none"> <li>(a) clear volumes from <b>capacity blocks</b> using the unconstrained clearing methodology in subsection 5 against the final demand curve established in accordance with Section 207.4 of the ISO rules, <i>Shape of the Demand Curve</i>;</li> <li>(b) update the volumes cleared using the constrained clearing methodology in subsection 6, as applicable;</li> <li>(c) if the update in subsection 4(1)(b) results in a reduction in cleared volumes, clear additional volumes using the unconstrained clearing methodology in subsection 5 against the target volume established in subsection 3(2) <b>if the volume cleared after adjustment falls below the minimum procurement requirement</b>; and</li> <li>(d) if additional volumes were cleared in accordance with 4(1)(c), repeat the step in subsection 4(1)(b).</li> </ul> <p>Constraint management should not be addressed in the capacity market. CWG reiterates its comment that the incremental volume does not need to be cleared if there is a constraint. The constrained unit should be paid and should be held accountable for performance in all hours other than where the constraint binds, but there is no reliability requirement to clear incremental capacity. Capacity is not the</p>	<p>The AESO does not agree with the change proposed by CWG. Please refer to the AESO’s reply to Capital Power’s general comment above regarding the AESO’s mandate to plan and arrange for a transmission system that is substantially congestion free.</p> <p>The capacity market clearing price should produce a price signal that reflects the demand and supply of capacity in an uncongested transmission system. This recognizes that the legislative framework where the signal to relieve transmission congestion is provided in the Transmission Regulation, and therefore should not be reflected in market prices.</p> <p>Awarding capacity commitments to assets that are expected to be unable to deliver results in a lower level of supply adequacy than would be expected based on the capacity volume procured while consumers are paying costs which are associated with a higher level of adequacy as per the demand curve. By clearing additional offer blocks to meet the target volume that was determined through the unconstrained clearing process, additional costs to meet supply adequacy that are caused by issues on the transmission system may be incurred and will be compensated through the uplift payment. As such, the uncongested clearing price and the uplift payment would send separate and distinct signals, the former regarding capacity market demand and supply and the latter regarding the cost of transmission congestion.</p>

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<p>energy market and there is no specific need to maintain the volume at the unconstrained level. As long as the minimum target is achieved, intervention is not required.</p> <p>The rule also does not make clear the nature of the constraint that is being contemplated. A constraint that is expected to occur only under very unusual contingency conditions is very different than a binding constraint under N-0 conditions or a constraint that does not allow a resource capacity to be connected. The rule lacks clarity and CWG is very concerned that very minor constraint risks will be allowed to impact the capacity market.</p>	
<p><b>Unconstrained Clearing Methodology</b> <b>Section 5(3)</b></p>	
<p><u>TransAlta Corporation (TransAlta)</u></p> <p>The ISO must, when multiple <b>capacity blocks</b> are submitted at the clearing price and result in the same social surplus, clear such <b>capacity blocks</b> based on the following order of priority:</p> <ul style="list-style-type: none"> <li>(a) for a <b>rebalancing auction</b>, clear the volumes associated with the <b>capacity commitments</b> in subsection 2(a) before all other <b>capacity blocks</b>;</li> <li>(b) clear volumes from the <b>flexible blocks</b> over volumes from the <b>inflexible blocks</b>;</li> <li>(c) clear the <b>flexible blocks</b> after pro-rating and <b>randomly</b> rounding the <b>flexible blocks</b> to a whole number;</li> <li>(d) clear the smaller <b>inflexible blocks</b> before the larger <b>inflexible blocks</b>; and</li> <li>(e) randomly clear the equivalent <b>inflexible blocks</b>.</li> </ul> <p><b>The reference to “randomly” before “rounding” should be removed</b>, as we have indicated in the <b>yellow highlighted</b> text.</p> <p>We are unclear about the issue that the AESO is attempting to address with the reference to “randomly rounding”. We are not in favour of use of an arbitrary process that cannot be validated with respect to cleared blocks. Furthermore, we wish to understand why the AESO cannot simply “round” in a conventional fashion when deciding on clearing volumes. The AESO should justify the reason for introducing an arbitrary process and explain the significance of the issue of “randomly rounding” versus “rounding”.</p>	<p>The AESO does not agree with the change proposed by TransAlta. Subsection 5(3)(c) is intended to deal with situations where multiple flexible capacity blocks are submitted with the same offer price and the amount of capacity needed to maximize social surplus cannot be divided equally among the tied blocks. The auction clearing tool will first prorate the tied blocks and, where such pro-rating results in decimal value, randomize the rounding of the block up or down to a whole number.</p> <p>For example if 10MW of capacity is to be divided between three equally sized 4 MW offer, one of those blocks will be allocated 4 MW and the other two will be allocated 3 MW such that the total awarded between the three offers is 10 MW. The selection of which block receives the extra MW will be a random.</p>

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<p><b>Constrained Clearing Methodology</b> <b>Section 6(1)</b></p>	
<p><u>Capital Power Corporation (“Capital Power”)</u></p> <p>Capital Power is concerned with the AESO’s proposal to apply different clearing processes to existing capacity assets and new capacity assets whose ability to deliver or connect may be limited by a transmission constraint, as described in subsections 6(1) and 6(2), respectively. The rationale for applying different treatment to new and existing assets in this respect and the need for separate subsections is unclear. Please explain.</p> <p>Capital Power believes that the clearing process outlined in 6(1) for existing assets whose ability to deliver capacity may be impacted by a limit on the transmission system should be the same clearing process applied to new assets whose ability to connect in an unconstrained manner may be impacted by a transmission limit. Such an approach appears more consistent with the principle of ensuring a level playing field. If all market participants are aware of anticipated transmission limits prior to the auction, they can effectively compete for available transmission, adjusting the type and price of their offer blocks to reflect individual risk tolerances. It is not clear to Capital Power why new assets with a potential connection constraint would be cleared on the basis of weighted average offer price and existing assets behind a potential constraint cleared based on capacity block price. Capital Power believes that it would be more conducive to effective competition to clear all assets impacted by transmission limits in the same manner, i.e. based on capacity block price.</p> <p>The proposed dissimilar treatment of new and existing assets impacted by transmission limits creates additional confusion in the event where both new and existing assets are located behind the same constraint. The rule does not specify how the auction would be cleared in such situations and whether one asset type would take priority over another. Capital Power believes that this confusion could be resolved by removing subsection 6(2) and having subsection 6(1) apply to all assets, new and existing. Using the same clearing process would allow the best opportunity for all assets behind a constraint to compete for available transmission.</p> <p>The AESO’s rationale for applying different clearing processes to new and existing assets impacted by transmission limits must be explained, and Capital Power requests the opportunity to comment further on Section 201.13 in light of such explanation.</p>	<p>The AESO provided an explanation of the different clearing processes in the December 18, 2018 Letter of Notice that was issued with the revised draft of proposed Section 201.13.</p> <p>For existing assets, the ability to deliver capacity depends on the extent to which constraints on the transmission system might limit the ability of in-merit energy to be delivered from the asset. A transmission constraint may prevent a portion of the energy associated with an existing asset’s cleared capacity from being delivered. These delivery limitations are not binary; rather, they impact the amount of energy that is delivered from the asset. Therefore, existing assets are assessed on a block-by-block basis in the constrained clearing methodology.</p> <p>Due to the binary nature associated with connections (i.e. a new asset is either connected or it is not), new assets are evaluated on an “entire asset” basis in the constrained clearing methodology. The ability of a new asset to deliver capacity hinges on its ability to connect to the system: if a new asset can connect in an area, it can deliver all of its capacity that may be cleared in an auction; if a new asset cannot connect in an area because of current limitations, it cannot deliver any of its capacity that may be cleared in an auction. A new asset will not be eligible to clear if the connection of the new asset resulted in an existing asset not being able to deliver its energy.</p>

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<p><u>TransAlta Corporation (TransAlta)</u></p> <p>The <b>ISO</b> must, in the event that the <b>ISO</b> determines that a limit on the <b>transmission system</b>, or a limit on an Alberta <b>intertie</b> determined in accordance with subsection 7, may impact the ability of an asset to deliver electric energy to the Alberta <b>interconnected electric system</b> during the <b>obligation period</b>, clear <b>capacity blocks</b> from assets behind the same limit, without clearing an amount of capacity that exceeds the limit, as follows:</p> <ul style="list-style-type: none"> <li>(a) subject to subsection 6(1)(b), clear a lower priced <b>capacity block</b> before a higher priced <b>capacity block</b>;</li> <li>(b) if clearing a lower priced <b>capacity block</b> would exceed the limit, clear a higher priced <b>capacity block</b> when such action minimizes the amount of uplift paid in accordance with subsection 8; and</li> <li>(c) in the event that multiple <b>capacity blocks</b> are submitted at the same price, clear such <b>capacity blocks</b> in the following order of priority: <ul style="list-style-type: none"> <li>i. for a <b>rebalancing auction</b>, clear the volumes associated with <b>capacity commitments</b> in subsection 2(a) before all other <b>capacity blocks</b>;</li> <li>ii. clear volumes from the <b>flexible blocks</b> over volumes from the <b>inflexible blocks</b>;</li> <li>iii. clear the <b>flexible blocks</b> after pro-rating and randomly rounding the <b>flexible blocks</b> to a whole number;</li> <li>iv. clear the smaller <b>inflexible blocks</b> before the larger <b>inflexible blocks</b>; and</li> </ul> </li> <li>(d) (v) randomly clear the equivalent <b>inflexible blocks</b>.</li> </ul> <p>Please see our comments to subsection 5(3) above.</p>	<p>The AESO does not agree with the change proposed by TransAlta to subsection 6(1). Please see the AESO's reply to TransAlta's comment on subsection 5(3) above.</p>

Stakeholder Comments and/or Proposed Alternative Rule Wording	AESO Replies
<p><b>Section 6(2)</b></p>	
<p>The <b>ISO</b> must, in the event that the ISO determines that a limit on the <b>transmission system</b>, or a limit on an Alberta <b>intertie</b> determined in accordance with subsection 7 may impact the ability of an asset with volumes cleared pursuant to the unconstrained methodology in subsection 5 to connect in an unconstrained manner to the Alberta <b>interconnected electric system</b>, as defined by Alberta Reliability Standards:</p> <p>(a) <b>make public all identified transmission system limits and limits on an Alberta intertie that may impact the ability of an asset to clear prior to the new capacity qualification process and 3 months prior to each auction.</b></p> <p>(a) determine whether an asset is likely able to connect as follows:</p> <ol style="list-style-type: none"> <li>i. determine the weighted average <b>offer</b> price of each asset that is potentially impacted by a limit considering all <b>capacity blocks</b> in the <b>offer</b> associated with the asset;</li> <li>ii. prioritize the assets based on lowest to highest weighted average <b>offer</b> price;</li> <li>iii. if 2 or more assets have the same weighted average <b>offer</b> price, prioritize the assets <b>based on earliest connection in service date.</b> as follows:             <ol style="list-style-type: none"> <li>(A) <del>use the highest percentage of the assigned uniform capacity value contained in <b>capacity blocks</b> that cleared in the unconstrained methodology in subsection 5; or</del></li> <li>(B) <del>if 2 or more assets have the same percentage of uniform capacity value in subsection 6(2)(a)(iii) (A), randomly prioritize the assets;</del></li> </ol> </li> <li>iv. assess each asset in order of priority determined in accordance with subsections 6(2)(a)(ii) and 6(2)(a)(iii), as applicable; and</li> <li>v. when conducting an assessment in subsection 6(2)(a)(iv), assume that all assets assessed prior and determined as likely able to connect to be connected in such assessment;</li> </ol> <p>and</p>	<p>The AESO does not agree with the changes proposed by TransAlta to subsection 6(2). However, the AESO will revise subsections 6(1) and 6(2) to include additional detail in order to provide greater clarity on how transmission limits will be determined, The AESO also anticipates including additional information about the process for identifying transmission constraints in an associated information document. Transmission limits will not be fixed in all cases. More often, they will be dependent on, or will change based on, the assessment of new asset connections and are not capable of being identified in advance of auction clearing. To the extent that a transmission limit is fixed and not dependent on the combination of assets connected in an area (e.g., a cut-plane limit), the AESO expects that it will be able to publish the limit and identify the assets that are subject to it before auction clearing.</p> <p>A new asset will only be qualified for an auction if the AESO is satisfied that the asset will be capable of connecting as described in Section 206.1, <i>Qualification of Capacity</i>. The AESO does not agree that priority in capacity market clearing should be given to assets with earlier in service dates. When two assets have the same weighted average price the AESO will give priority to assets that have the highest percentage of their assigned UCAP priced below the unconstrained clearing price. This approach incents assets to price competitively and prioritizes assets that have the lowest overall cost or offer structure.</p> <p>Please see the AESO’s replies to Capital Power’s general comment and to the CWG’s comment on subsection 6(1) above regarding the AESO’s planning mandate under the <i>Transmission Regulation</i>.</p>

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<p>(b) clear all the <b>capacity blocks</b> from assets that have been determined likely able to connect in accordance with 6(2)(a) where such <b>capacity blocks</b> have cleared pursuant to the unconstrained methodology in subsection 5.</p> <p>The AESO should be required to make all limits on the transmission system or on Alberta interties public prior to the qualification of new capacity process and before each auction and should prioritize assets with the same weighted average offer price based on earliest connection in-service date, as we have indicated in the <b>yellow highlighted</b> text.</p> <p>The AESO has not explained how the provisions of this subsection which appears to contemplate persistent transmission congestion are aligned with the AESO's obligations under the Transmission Regulation. The AESO is obliged to ensure that all anticipated in-merit electric energy is sufficiently robust so that it can be delivered 100% of the time when all transmission facilities are in service and 95% of the time under abnormal operating conditions. We wish to clarify the practices and processes that the AESO will implement to minimize the use of this subsection.</p> <p>Additionally, TransAlta suggests that in the event that two or more assets have the same weighted average offer price such that offers cannot be used to prioritize assets that the AESO clear assets that are already connected to the system. In contrast, the proposed mechanism is arbitrary using the highest percentage of assigned uniform capacity value or a random process to prioritize assets and could result in higher costs to consumers. Prioritizing assets that are already connected to the transmission system minimizes the potential cost to consumers associated with new transmission connections and builds and maximizes the utilization of the existing transmission system.</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 201.13 of the ISO Rules, <i>Capacity Market Clearing</i> relates to the capacity market and why or why not	<p><u>Capital Power Corporation (“Capital Power”)</u> Capital Power agrees that the proposed rule relates to the capacity market.</p> <p><u>TransAlta Corporation (TransAlta”)</u> Please refer to our Appendix 1 to TransAlta’s November 14, 2018 submission. Our comments with respect to Items #1-9 have not changed.</p>	<p>The AESO acknowledges Capital Power’s comment.</p> <p>Please see the AESO’s November 29, 2018 replies to Appendix 1 of TransAlta’s November 14, 2018 submission. Please also see the AESO’s November 29, 2018 replies to TransAlta’s comments on Section 201.13, <i>Capacity Market Clearing</i>.</p>
2	whether you agree that Section 201.13 of the ISO Rules, <i>Capacity Market Clearing</i> should or should not be in effect for a fixed term and why or why not	<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><u>TransAlta Corporation (TransAlta”)</u> Please refer to our Appendix 1 to TransAlta’s November 14, 2018 submission. Our comments with respect to Items #1-9 have not changed.</p>	<p>The AESO acknowledges Capital Power’s comments.</p> <p>Please see the AESO’s November 29, 2018 replies to Appendix 1 of TransAlta’s November 14, 2018 submission. Please also see the AESO’s November 29, 2018 replies to TransAlta’s comments on Section 201.13, <i>Capacity Market Clearing</i>.</p>
3	whether you understand and agree with the objective or purpose of Section 201.13 of the ISO Rules, <i>Capacity Market Clearing</i> and whether, in your view, Section 201.13 of the ISO Rules, <i>Capacity Market Clearing</i> meets the objective or purpose	<p><u>Capital Power Corporation (“Capital Power”)</u> See comments above.</p>	<p>Please see the AESO’s replies to Capital Power’s comments above.</p>

		<p><u>TransAlta Corporation (TransAlta™)</u></p> <p>Please refer to our Appendix 1 to TransAlta’s November 14, 2018 submission. Our comments with respect to Items #1-9 have not changed.</p>	<p>Please see the AESO’s November 29, 2018 replies to Appendix 1 of TransAlta’s November 14, 2018 submission. Please also see the AESO’s November 29, 2018 replies to TransAlta’s comments on Section 201.13, <i>Capacity Market Clearing</i>.</p>
4	<p>how, in your view, Section 201.13 of the ISO Rules, <i>Capacity Market Clearing</i> affects the performance of the capacity market and the electricity market</p>	<p><u>Capital Power Corporation (“Capital Power”)</u></p> <p>Capital Power has no comments at this time.</p>	
		<p><u>The Cogeneration Working Group (“CWG”)</u></p> <p>The AESO has made improvements with the latest iteration of this rule with respect to the clearing mechanism itself.</p> <p>However, there is still concern around the treatment of constrained capacity. Clearing incremental capacity should only occur when minimum reliability targets are not met. A key concern is that new generation build could be triggered by clearing an offer out of merit due to congestion, and when the congestion is resolved the market has artificially added capacity. CWG requests rationale on what is driving the decision to clear incremental capacity in response to a constraint.</p> <p>CWG also requests that clarity on the nature of the constraint that would trigger the use of subsection 5.</p>	<p>Please see the AESO’s replies to the CWG’s comment on subsection 4(1) and to Capital Power’s comment on subsection 6(1) above.</p>
		<p><u>TransAlta Corporation (TransAlta™)</u></p> <p>Please refer to our Appendix 1 to TransAlta’s November 14, 2018 submission. Our comments with respect to Items #1-9 have not changed.</p>	<p>Please see the AESO’s November 29, 2018 replies to Appendix 1 of TransAlta’s November 14, 2018 submission. Please also see the AESO’s November 29, 2018 replies to TransAlta’s comments on Section 201.13, <i>Capacity Market Clearing</i>.</p>

5	your views on any analysis conducted or commissioned by the AESO supporting Section 201.13 of the ISO Rules, <i>Capacity Market Clearing</i>	<p><u>Capital Power Corporation (“Capital Power”)</u> Capital Power has no comments at this time.</p>	
		<p><u>TransAlta Corporation (TransAlta”)</u> Please refer to our Appendix 1 to TransAlta’s November 14, 2018 submission. Our comments with respect to Items #1-9 have not changed.</p>	<p>Please see the AESO’s November 29, 2018 replies to Appendix 1 of TransAlta’s November 14, 2018 submission. Please also see the AESO’s November 29, 2018 replies to TransAlta’s comments on Section 201.13, <i>Capacity Market Clearing</i>.</p>
6	whether you agree with Section 201.13 of the ISO Rules, <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	<p><u>Capital Power Corporation (“Capital Power”)</u> Capital Power has no comments at this time.</p>	
		<p><u>TransAlta Corporation (TransAlta”)</u> Please refer to our Appendix 1 to TransAlta’s November 14, 2018 submission. Our comments with respect to Items #1-9 have not changed.</p>	<p>Please see the AESO’s November 29, 2018 replies to Appendix 1 of TransAlta’s November 14, 2018 submission. Please also see the AESO’s November 29, 2018 replies to TransAlta’s comments on Section 201.13, <i>Capacity Market Clearing</i>.</p>
7	whether you would suggest any alternatives to Section 201.13 of the ISO Rules, <i>Capacity Market Clearing</i>	<p><u>Capital Power Corporation (“Capital Power”)</u> Capital Power has no comments at this time.</p>	
		<p><u>TransAlta Corporation (TransAlta”)</u> Please refer to our Appendix 1 to TransAlta’s November 14, 2018 submission. Our comments with respect to Items #1-9 have not changed.</p>	<p>Please see the AESO’s November 29, 2018 replies to Appendix 1 of TransAlta’s November 14, 2018 submission. Please also see the AESO’s November 29, 2018 replies to TransAlta’s comments on Section 201.13, <i>Capacity Market Clearing</i>.</p>

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.	
		<u>TransAlta Corporation (TransAlta”)</u> Please refer to our Appendix 1 to TransAlta’s November 14, 2018 submission. Our comments with respect to Items #1-9 have not changed.	Please see the AESO’s November 29, 2018 replies to Appendix 1 of TransAlta’s November 14, 2018 submission. Please also see the AESO’s November 29, 2018 replies to TransAlta’s comments on Section 201.13, <i>Capacity Market Clearing</i> .
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.	
		<u>TransAlta Corporation (TransAlta”)</u> Please refer to our Appendix 1 to TransAlta’s November 14, 2018 submission. Our comments with respect to Items #1-9 have not changed.	Please see the AESO’s November 29, 2018 replies to Appendix 1 of TransAlta’s November 14, 2018 submission. Please also see the AESO’s November 29, 2018 replies to TransAlta’s comments on Section 201.13, <i>Capacity Market Clearing</i> .

***Please provide your views on the type of content that should be included in an information document associated with Section 201.13, Capacity Market Clearing***

**Capital Power**

Capital Power requests that detailed information be included in an associated information document with respect to the ISO's proposed process for identifying transmission constraints, determining the likelihood that such constraints will limit unconstrained delivery or connection during the obligation period, and notifying potentially constrained resources and the market of constraints prior to the auction.

Additionally, Capital Power believes that an associated information document should provide greater clarity with respect to how auctions will be cleared "randomly" and what oversights the ISO will have in place to ensure impartiality.

Please see the AESO's replies to TransAlta's comments on subsections 5(3) and 6(2) above.

**TransAlta**

The Information Document should explain the AESO's methodology for identifying limits on the transmission system as well as how information about congestion on the transmission system will be conveyed to market participants.

Please see the AESO's replies to TransAlta's comments on subsections 5(3) and 6(2) above.