

Stakeholder Comments and AESO Replies Matrix



Proposed New Section 206.4 of the ISO Rules, *Offers and Bids for Capacity*

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>Obligation to Offer and Offer Content for a Base Auction Subsection 2(1)</p>	
<p><u>TransAlta Corporation (“TransAlta”)</u></p> <p>The offer volume that a capacity market participant must offer in the base auction should be adjusted for asset substitutions.</p> <p>Asset substitutions are a key mechanism for new, refurbished and incremental capacity to procure partial periods of capacity to meet a capacity commitment. As such, TransAlta has proposed changes to Section 206.9: Asset Substitution to allow capacity market participants to enter into asset substitution for any amount time during their obligation period.</p> <p>The proposed changes to the offer requirement have been revised to contemplate asset substitution volume, as indicated in our recommended changes to the rule language in yellow highlighted text.</p> <p>2(1) A capacity market participant must:</p> <ul style="list-style-type: none"> (a) submit an offer for a base auction in respect of an asset; and (a) ensure the volume of the offer in subsection 2(1)(a) is equal to the asset’s assigned uniform capacity value less any asset substitutions entered into for the obligation period. 	<p>The AESO does not agree with the changes proposed by TransAlta to subsection 2(1). Please see the AESO’s reply to TransAlta’s comments on subsection 7(2) of Proposed Section 206.8, <i>Obligation Period Performance Assessments</i>.</p>

Stakeholder Comments and/or Proposed Alternative Rule Wording	AESO Replies
Subsection 2(2)	
<p><u>Alberta Federation of Rural Electrification Associations (“AFREA”)</u></p> <p>Is the need to offer at least 1 MW in each of the seven offer blocks required, even for small plants?</p>	<p>While an asset with an assigned uniform capacity value is allocated 7 capacity blocks for offering into the auction, it is not required to use all 7 blocks. The quantity offered within a capacity block must be a positive integer.</p>
Subsection 2(4)	
<p><u>Alberta Federation of Rural Electrification Associations (“AFREA”)</u></p> <p>2(4) A capacity market participant must, for a person that has been provided an offer price cap or has in accordance with Section 206.7 of the ISO rules, <i>Capacity Market Mitigation</i>, submitted an offer in the base auction for the quantity of the asset’s uniform capacity value that the person has offer control over at a price equal to or below:</p>	<p>Proposed Section 206.4 posted for consultation on October 22, 2018 does not contain the word “submitted” in subsection 2(4) as indicated in AFREA’s comment.</p>
Obligation to Offer and Offer Content for a Rebalancing Auction Subsection 3(1)	
<p><u>Alberta Federation of Rural Electrification Associations (“AFREA”)</u></p> <p>You may want to specify which capacity commitment you are referring to here.</p> <p>3(1) A capacity market participant must, if the assigned uniform capacity value of the capacity market participant’s associated asset is greater than the capacity commitment:</p> <p>(a) submit an offer for in a rebalancing auction for that asset; and</p>	<p>The AESO does not agree with the change proposed by AFREA. In the AESO’s view it is clear that the capacity commitment is for the obligation period for which the rebalancing auction is being held.</p>
<p><u>TransAlta Corporation (“TransAlta”)</u></p> <p>The offer volume that a capacity market participant must offer in the rebalancing auction should also be adjusted for asset substitutions.</p> <p>Please see our comments to subsection 2(2) above explaining the reason for the changes to the rule language in yellow highlighted text.</p> <p>3(1) A capacity market participant must, if the assigned uniform capacity value less any</p>	<p>Please see the AESO’s reply to TransAlta’s comment on subsection 2(1) above.</p>

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<p>asset substitutions entered into for the obligation period of the capacity market participant's associated asset is greater than the capacity commitment:</p> <p>(a) submit an offer for a rebalancing auction for that asset; and</p> <p>(b) ensure the volume of the offer in subsection 3(1)(a) is equal to the difference between the asset's assigned uniform capacity value and the capacity commitment.</p> <p>(2) A capacity market participant must, if the capacity market participant's asset is not subject to a capacity commitment:</p> <p>(a) submit an offer for a rebalancing auction for that asset; and</p> <p>(b) ensure the volume of the offer in subsection 3(2)(a) is equal to the asset's assigned uniform capacity value less any asset substitutions entered into for the obligation period.</p>	
<p>Additional Offer Content for Refurbished Capacity</p> <p>Subsection 6(1)</p>	
<p><u>Capital Power Corporation ("Capital Power")</u></p> <p>Capital Power remains concerned with, and unresponsive of, proposed limitations imposed on mitigated capacity market participants with respect to bidding refurbished capacity, as described in subsection 6.</p> <p>In Capital Power's view, the "two-part" bidding mechanism for refurbished capacity is a critical element of the capacity market design and, for substantial investments in refurbished capacity, should not be limited to a one-time opportunity. Without the ability to two-part bid, asset owners will be challenged to invest in substantial refurbishments, such as repowering, as there will not be an opportunity for the refurbishment to earn a return on and of capital. This has consequences for the design ensuring reliability at reasonable cost, as refurbished capacity is generally less expensive than new capacity. Without the ability to two-part bid refurbished capacity more than once, existing resources owned by mitigated participants would be more likely to retire than refurbish, resulting in a lost opportunity for lower-cost—and potentially more efficient—supply. This, in Capital Power's view, will threaten competition among resources and ultimately, price fidelity.</p> <p>Capital Power is concerned that an inability to offer potential refurbished capacity will create a barrier to investment in affordable supply. Both the efficiency and competitiveness of the capacity market, and its objective of reliability at reasonable cost, are at risk with this design choice.</p>	<p>The AESO does not agree with Capital Power's suggestion and is of the view that it is important from a FEOC perspective to place a restriction on the ability to submit a "two-stage" offer for assets meeting the refurbishment criteria and held by firms subject to capacity market mitigation. As stated in the CMD Final Rationale document, section 2.1.13, this is to prevent mitigated participants from having an ongoing "free" option to continually have an "opportunistic" higher priced offer in the supply stack. Such an option would allow these participants a zero risk ability to offer in such a way that they could capture and potentially set higher market prices, while limiting the risk of not clearing the market that such an offer would normally entail. In the AESO's view, the proposed rule strikes the appropriate balance between a reasonable limitation on offer behavior to prevent the abuse of market power while providing participants the opportunity to, at a time of their choosing based on their assessment of market conditions, submit a capacity market offer to reflect refurbishment costs.</p> <p>In the course of considering Capital Power's comments, the AESO has concluded that the market rules would benefit from additional clarity as to how requirements apply to participants with refurbished assets that are not subject to mitigation in the capacity market. The AESO intends to amend the capacity market rules to make it clear that non-mitigated participants with refurbished assets will not be able to submit a "two-stage" offer, but will also not be subject to the associated restrictions such as frequency limitations or permanent delist requirements if a refurbishment offer</p>

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<p>To resolve these issues, Capital Power proposed the following solution in its Set 2 rule comments:</p> <p>Solution: Firms deemed to possess market power in accordance with Section 206.7 should be allowed the option to submit two-part bids for refurbished capacity (as per 6(1) (a) and (b)) with no restriction (i.e. no limit to two-part bidding as proposed in 6(4)) provided that such capacity: 1) represents an increased capital investment of greater than or equal to \$400/kW of the asset’s current maximum capability (double the refurbishment qualification threshold); OR 2) is bid below the mitigated offer cap of 0.8 net CONE.</p> <p>Capital Power is open to exploring other solutions that may resolve the issues highlighted above, though continues to believe that this solution will allow for a fairer treatment of capital-intensive refurbishments, such as repowering, as well as address concerns expressed by the AESO in CMD Final Rationale Document with respect to potential abuse of the refurbishment offer process.</p>	<p>does not clear.</p>
<p>The reference to subsection 2(4) in subsections 6(1) (a) and 6(3) (a) is incorrect. 2(4) references a price below the default offer cap or at the asset-specific cap. It is Capital Power’s understanding, based on the CMD Final and the previous draft of the rule, that first offer is for the refurbished capacity is intended to be unmitigated. The correct reference in both instances is subsection 2(2) – which references an unmitigated price.</p> <p>The reference to subsection 3(3)(b) in subsections 6(1) (b) and 6(3) (b) is also incorrect. 3(3)(b) refers to the rebalancing auction and to a quantity not a price. The correct reference in these instances is to 2(4) – which references a mitigated price. The existing asset would be mitigated.</p> <p>Additionally, there are two subsection 6(3)’s, a numbering revision is required.</p> <p>Above comments aside, cross-references in subsections 6(1) (a) and (b), and 6(3) (a) and (b) appear to be inaccurate and should be revised as follows:</p> <p>6(1) A capacity market participant that has failed the market power screen in accordance with Section 206.7 of the ISO rules, Capacity Market Mitigation must, for an asset with refurbished capacity for which the capacity market participant declared to continue to participate in the energy and capacity markets the in event that the capacity market participant fails to receive a capacity commitment for such asset in a base auction or rebalancing auction in accordance with Section 206.1 of the ISO rules, Qualification of Capacity, submit 2 offers as follows:</p> <p>(a) a first offer comprised of one capacity block that is an inflexible block at the price referred</p>	<p>The AESO will correct the subsection references in Proposed Section 206.4.</p>

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<p>to in subsection 2(24); and (b) a second offer based on the offer the capacity market participant would have submitted had the ISO not qualified the refurbished capacity at the price referred to in subsection 3(3)(b)2(4).</p> <p>(2) A capacity market participant that has failed the market power screen in accordance with Section 206.7 of the ISO rules, <i>Capacity Market Mitigation</i> must, for an asset with refurbished capacity for which the capacity market participant declared to permanently delist in the event that the capacity market participant fails to receive a capacity commitment for such asset in a base auction or rebalancing auction in accordance with Section 206.1 of the ISO rules, <i>Qualification of Capacity</i>, submit an offer comprised of one capacity block that is an inflexible block.</p> <p>(3) A capacity market participant may, if it has submitted an offer in accordance with subsection 6(1)(a) and the offer does not clear, submit in subsequent base auctions: (a) an offer comprised of one capacity block that is an inflexible block at the price referred to in subsection 2(24); or (b) an offer based on the offer the capacity market participant would have submitted had the ISO not qualified the refurbished capacity at the price referred to in subsection 2(2)3(3)(b).</p> <p>(43) A capacity market participant must, in the event that the capacity market participant submitted an offer for refurbished capacity in accordance with subsection 6(3)(a) and the offer did not clear, permanently delist the asset in accordance with Section 201.15 of the ISO rules, <i>Delisting</i>.</p>	
Subsection 6(3)	
<p><u>Alberta Federation of Rural Electrification Associations</u></p> <p>There are two subsection 6(3)'s.</p> <p>There is a reference here made to 3(3)(b). That reference may not be correct.</p>	<p>The AESO will correct the subsection references in Proposed Section 206.4.</p>

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<p>Subsection 6(3)</p>	
<p><u>TransAlta Corporation (“TransAlta”)</u></p> <p>The restriction on the number of times that a multi-offer refurbished asset bid can be made should be removed.</p> <p>As stated in our comments to CMD 4:</p> <p>A market participant should be able to submit a refurbished capacity asset prequalification again in future auctions.</p> <p>The one-time for a capacity market participant to submit a multi-offer refurbished asset bid is overly restrictive and harsh. The AESO’s rationale is that allowing multiple refurbished offer bids could lead to abuse because refurbished assets can submit multi-offer bids “to continually have an “opportunistic” higher priced offer in the supply stack while mitigated”. However, the proposed restriction could unnecessarily impede timely coal-to-gas conversions from moving forward. The timing of coal-to-gas conversions is highly tied to supply and demand conditions and market economics that cannot be known with any certainty and are subject to change over time. A coal-to-gas conversion may fail to clear the first year that it is bid, but could be found in a subsequent year to be economic. Moreover, under the AESO’s proposal, an asset that attempts to clear the capacity market on a subsequent attempt must permanently delist or retire if it is unsuccessful. The AESO cannot create rules that force permanent retirement. Such rules would be unconscionably punitive and would represent a failure by the AESO to exercise its duties and perform its functions in a fair and responsible manner in respect of the market.</p> <p>In its place, the AESO should implement a simple requirement that the capacity offer must reflect the cost of the refurbishment. This would remove concerns of opportunistic offering by ensuring the underlying economics are appropriately accounted for, which would help create an efficient market outcome.</p> <p>Additionally, we have noted a minor subsection numbering correction.</p> <p>6(43) A capacity market participant must, in the event that the capacity market participant submitted an offer for refurbished capacity in accordance with subsection 6(3)(a) and the offer did not clear, permanently delist the asset in accordance with Section 201.15 of the ISO rules, Delisting. [requirement that the capacity offer must reflect the cost of the refurbishment]</p>	<p>Please see the AESO’s reply to Capital Power’s comment on subsection 6(1) above.</p>

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<p>Bid Content</p> <p>Subsection 7(2)</p>	
<p><u>Alberta Federation of Rural Electrification Associations</u></p> <p>If there are multiple offers at this price, how will those offers be accepted or rejected if you can't choose them all?</p> <p>The term physical delist is not defined. Are other kinds of delists to be included here? You may want to clean up the definitions of delists.</p> <p>May want to be clear about what capacity commitment you are referring to.</p> <p>(a) if the asset's assigned uniform capacity value for a rebalancing auction is lower than the capacity commitment due to a permanent or temporary physical delist request, the capacity market participant must submit a bid, in MW equal to the difference between the capacity commitment and the assigned uniform capacity value;</p> <p>What happens if this determination is made too late to make the bid?</p> <p>(c) if the ISO determines that the capacity market participant has not satisfied a critical milestone in accordance with Section 206.5 of the ISO rules, Forward Period Milestone Requirements, the capacity market participant must submit a bid equal to its entire capacity commitment in the applicable rebalancing auction.</p>	<p>The process to determine the selection of multiple offers and bids at the same price is contained within subsection 4(2) of proposed Section 201.13, <i>Capacity Market Clearing</i>.</p> <p>The AESO does not agree that physical delist needs to be a defined term. The intent of physical delisting is described in proposed Section 201.15, <i>Delisting</i>.</p> <p>The AESO does not agree with the recommended addition to subsection 7(2)(a). However, the AESO will revise proposed Section 206.4 to clarify the bid is a quantity.</p> <p>If it is determined after the second rebalancing of an obligation period that an asset to be providing new capacity has missed the milestone, the security and capacity payment for the new capacity asset held by the AESO will not be released until the asset to be providing new capacity has completed commissioning. Performance measurement assessments will apply to any outstanding obligations</p>
<p><u>TransAlta Corporation ("TransAlta")</u></p> <p>The requirement to buyback the entire capacity commitment for missing a critical milestone is too severe and will result in costly and unnecessary purchases in the rebalancing auction, which could limit the market's ability to attract new, incremental and refurbished capacity – thereby putting reliability at-risk.</p> <p>A capacity market participant should be allowed to use asset substitution to meet its capacity commitments, and should only be required to buyback its capacity commitment in a proportional amount to the monthly delay in its in-service date.</p> <p>Capacity market participants should be able to use asset substitution to procure capacity from other participants for partial periods to fulfill their capacity commitments. TransAlta has proposed changes to Section 206.9: Asset Substitution to provide the flexibility to enter into these important partial period arrangements. The AESO's proposal unfairly subjects capacity market participants to</p>	<p>The AESO does not agree with TransAlta's comment. Capacity is an annual product and the delivery of a new asset is a binary event. It is not online in proportion to its missed milestone. If an asset is reasonably determined to have missed a critical milestone, it is not in the position to provide the capacity product and hence achieve the reliability objectives of the market. Therefore, it is required to buy-back its entire capacity commitment as opposed to a time-prorated portion of the capacity commitment. This treatment is consistent with temporary delisting because in these cases a capacity commitment has not been entered into. It is important for each base or rebalancing auction to have the maximum amount of liquidity possible; as such, asset substitutions cannot occur until after the last rebalancing auction.</p>

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<p>12 months of capacity costs for missed milestones and potential in-service date delays of less than 12 months. This incorrectly assumes the capacity resource will be unavailable for the entire obligation period, and will result in costly and unnecessary purchases in the rebalancing auction, which could limit the market’s ability to attract new, incremental and refurbished capacity – thereby putting reliability at-risk.</p> <p>The capacity market participant should only be required to buyback its capacity commitment to the extent that it is expected to be unavailable within the obligation period, and if it cannot arrange an asset substitution that would allow its delayed in-service date. For example, a capacity resource that has a delayed in-service date of 3 months should only be required to buyback 25% of their capacity commitment in the rebalancing auction. The only situations where the capacity market participant should be required to buyback its entire capacity commitment is if it cannot achieve an in-service date within the obligation period.</p> <p>We have proposed our recommended changes to the rule language in yellow highlighted text.</p> <p>7(2) A capacity market participant with a capacity commitment must submit a bid, priced at \$0.01/kW-year above the price cap established by the final demand curve for the rebalancing auction, in accordance with the following:</p> <ul style="list-style-type: none"> (a) if the asset’s assigned uniform capacity value for a rebalancing auction is lower than the capacity commitment due to a permanent or temporary physical delist request, the capacity market participant must submit a bid equal to the difference between the capacity commitment and the assigned uniform capacity value; (b) if the asset’s assigned uniform capacity value for the last rebalancing auction is lower than the capacity commitment, the capacity market participant must submit a bid equal to the difference between the capacity commitment and the assigned uniform capacity value; or (c) if the ISO determines that the capacity market participant has not satisfied a critical milestone in accordance with Section 206.5 of the ISO rules, Forward Period Milestone Requirements, the capacity market participant must submit a bid equal to its entire capacity commitment in the applicable rebalancing auction.: <ul style="list-style-type: none"> (i) substitute capacity in accordance with Section 206.9: Asset Substitution to meet its capacity commitment; or (ii) submit a bid in the applicable rebalancing auction equal to: $\text{(Estimated months of delayed in-service date } \div 12) \times (\text{capacity commitment} - \text{asset substitution volume})$ 	

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 206.4 of the ISO Rules, <i>Offers and Bids for Capacity</i> relates to the capacity market and why or why not	<u>Alberta Federation of Rural Electrification Associations (“AFREA”)</u> See below.	Please see the AESO’s reply to AFREA’s comment on Item #10 below.
		<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.
		<u>TransAlta Corporation (“TransAlta”)</u> Please see Appendix 1 of TransAlta’s submission.	Please see the AESO’s replies to Appendix 1 of TransAlta’s November 14, 2018 submission in the AESO Replies to TransAlta’s Appendix 1 matrix.
2	whether you agree that Section 206.4 of the ISO Rules, <i>Offers and Bids for Capacity</i> should or should not be in effect for a fixed term and why or why not	<u>Alberta Federation of Rural Electrification Associations (“AFREA”)</u> See below.	Please see the AESO’s reply to AFREA’s comment on Item #10 below.
		<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.
		<u>TransAlta Corporation (“TransAlta”)</u> Please see Appendix 1 of TransAlta’s submission.	Please see the AESO’s replies to Appendix 1 of TransAlta’s November 14, 2018 submission in the AESO Replies to TransAlta’s Appendix 1 matrix.
3	whether you understand and agree with the objective or purpose of Section 206.4 of the ISO Rules, <i>Offers and Bids for Capacity</i> and	<u>Alberta Federation of Rural Electrification Associations (“AFREA”)</u> See below.	Please see the AESO’s reply to AFREA’s comment on Item #10

	<p>whether, in your view, Section 206.4 of the ISO Rules, <i>Offers and Bids for Capacity</i> meets the objective or purpose</p>		<p>below.</p>
		<p><u>Capital Power Corporation (“Capital Power”)</u> Capital Power has no comments at this time.</p>	
		<p><u>TransAlta Corporation (“TransAlta”)</u> Please see Appendix 1 of TransAlta’s submission.</p>	<p>Please see the AESO’s replies to Appendix 1 of TransAlta’s November 14, 2018 submission in the AESO Replies to TransAlta’s Appendix 1 matrix.</p>
<p>4</p>	<p>how, in your view, Section 206.4 of the ISO Rules, <i>Offers and Bids for Capacity</i> affects the performance of the capacity market and the electricity market</p>	<p><u>Alberta Federation of Rural Electrification Associations (“AFREA”)</u> See below.</p>	<p>Please see the AESO’s reply to AFREA’s comment on Item #10 below.</p>
		<p><u>Capital Power Corporation (“Capital Power”)</u> See Capital Power’s concerns outlined above with respect to the proposed bidding process for refurbished capacity.</p>	<p>Please see the AESO’s replies to Capital Power’s comments above.</p>
		<p><u>TransAlta Corporation (“TransAlta”)</u> Please see Appendix 1 of TransAlta’s submission.</p>	<p>Please see the AESO’s replies to Appendix 1 of TransAlta’s November 14, 2018 submission in the AESO Replies to TransAlta’s Appendix 1 matrix.</p>
<p>5</p>	<p>your views on any analysis conducted or commissioned by the AESO supporting Section 206.4 of the ISO Rules, <i>Offers and Bids for Capacity</i></p>	<p><u>Alberta Federation of Rural Electrification Associations (“AFREA”)</u> See below.</p>	<p>Please see the AESO’s reply to AFREA’s comment on Item #10 below.</p>
		<p><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.</p>	
		<p><u>TransAlta Corporation (“TransAlta”)</u> Please see Appendix 1 of TransAlta’s submission.</p>	<p>Please see the AESO’s replies to Appendix 1 of TransAlta’s November 14, 2018 submission in the AESO Replies to TransAlta’s</p>

			Appendix 1 matrix.
6	whether you agree with Section 206.4 of the ISO Rules, <i>Offers and Bids for Capacity</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> See below.	Please see the AESO’s reply to AFREA’s comment on Item #10 below.
		<u>Capital Power Corporation (“Capital Power”)</u> See Capital Power’s concerns outlined above with respect to the proposed bidding process for refurbished capacity.	Please see the AESO’s replies to Capital Power’s comments on subsection 6(1) above.
		<u>TransAlta Corporation (“TransAlta”)</u> Please see Appendix 1 of TransAlta’s submission.	Please see the AESO’s replies to Appendix 1 of TransAlta’s November 14, 2018 submission in the AESO Replies to TransAlta’s Appendix 1 matrix.
7	whether you would suggest any alternatives to Section 206.4 of the ISO Rules, <i>Offers and Bids for Capacity</i>	<u>Alberta Federation of Rural Electrification Associations (“AFREA”)</u> See below.	Please see the AESO’s reply to AFREA’s comment on Item #10 below.
		<u>Capital Power Corporation (“Capital Power”)</u> Capital Power has no comments at this time.	
		<u>TransAlta Corporation (“TransAlta”)</u> Please see Appendix 1 of TransAlta’s submission.	Please see the AESO’s replies to Appendix 1 of TransAlta’s November 14, 2018 submission in the AESO Replies to TransAlta’s Appendix 1 matrix.
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> See below.	Please see the AESO’s reply to AFREA’s comment on Item #10 below.
		<u>Capital Power Corporation (“Capital Power”)</u> See Capital Power’s concerns outlined above with respect to the proposed bidding process for refurbished capacity.	Please see the AESO’s replies to Capital Power’s comments on subsection 6(1) above.

		<p><u>TransAlta Corporation (“TransAlta”)</u> Please see Appendix 1 of TransAlta’s submission.</p>	<p>Please see the AESO’s replies to Appendix 1 of TransAlta’s November 14, 2018 submission in the AESO Replies to TransAlta’s Appendix 1 matrix</p>
9	whether you agree that the proposed provisional rule supports the public interest and why or why not	<p><u>Alberta Federation of Rural Electrification Associations (“AFREA”)</u> See below.</p>	<p>Please see the AESO’s reply to AFREA’s comment on Item #10 below.</p>
		<p><u>Capital Power Corporation (“Capital Power”)</u> Capital Power has no comments at this time.</p>	
		<p><u>TransAlta Corporation (“TransAlta”)</u> Please see Appendix 1 of TransAlta’s submission.</p>	<p>Please see the AESO’s replies to Appendix 1 of TransAlta’s November 14, 2018 submission in the AESO Replies to TransAlta’s Appendix 1 matrix</p>
10	whether you have any additional comments	<p><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.</p>	<p>The AESO acknowledges AFREA’s comment.</p>
		<p><u>Capital Power Corporation (“Capital Power”)</u> Capital Power has no further comments at this time.</p>	
		<p><u>TransAlta Corporation (“TransAlta”)</u></p>	<p>Please see the AESO’s replies to Appendix 1 of TransAlta’s</p>

		Please see Appendix 1 of TransAlta's submission.	November 14, 2018 submission in the AESO Replies to TransAlta's Appendix 1 matrix
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