

Proposed New ISO Rules Terms and Definitions for the Implementation of 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 Definition Wording	AESO Replies
<p>“avoidable costs” means the costs that are not incurred if an asset was temporarily delisted for the obligation period or a portion of the obligation period.</p>	
<p><u>Alberta Federation of Rural Electrification Associations (“AFREA”)</u></p> <p>It is not clear from the rules at what state of output the avoidable costs are to be calculated. They should be calculated a full output not partial output or yearly average output.</p> <p>“avoidable costs” means the costs, calculated at full output, that are not incurred if an asset was temporarily fully or partially delisted for the obligation period or a portion of the obligation period.</p>	<p>The AESO does not agree with the changes proposed by AFREA. Avoidable costs are costs that do not vary with output and only include the costs that can be avoided if the capacity asset was temporarily delisted for the obligation period. Net avoidable costs may be influenced by output level because the energy and AS offset vary with output level. Therefore, this definition does not require revision.</p>
<p><u>Capital Power Corporation (“Capital Power”)</u></p> <p>Capital Power has no specific comments with respect to the wording of this definition, however wishes to reiterate previous comments made with respect to sufficiently explaining determination of avoidable costs in the applicable ISO rules and Information Documents (“ID”):</p> <ul style="list-style-type: none"> • High-level avoidable cost categories, including a provision for “any other avoidable costs deemed reasonable”, should be specified in the related ISO rules (Sections 201.15 and 206.7). • Examples of specific costs that may fall in to these high-level categories should be provided in the related ID(s). • Guiding principles that the AESO will use in determining whether a cost is deemed an acceptable “avoidable cost” should be specified in the definition or ISO rule. These principles were specified in CMD Final as follows: <ul style="list-style-type: none"> a) <i>Avoidable costs must be the costs that would not be incurred if the capacity asset is delisted</i> 	<p>The AESO does not agree that the cost categories and principles provided in CMD Final Proposal should be included in the ISO rule as these are not authoritative or exhaustive. The principles for avoidable costs and high-level avoidable cost categories have been included in the associated Information Document. These principles and high-level avoidable cost categories are meant to provide participants more clarity on costs that may be acceptable, depending on the asset.</p>

Stakeholder Comments and/or Proposed Alternative Definition Wording	AESO Replies
<p><i>for a year. Costs that would be deferred but would still occur in a subsequent year are not considered as avoidable.</i></p> <p><i>b) Avoidable costs must be those that are expected to be incurred only during the obligation period when the capacity asset is delisted.</i></p> <p><i>c) All avoidable costs must adhere to the principle of cost reduction, not reallocation, transferring or re-monetization of the costs.</i></p>	
<p><u>TransAlta Corporation (“TransAlta”)</u></p> <p>Please see TransAlta’s comment matrix for Section 206.7: Capacity Market Mitigation submitted on September 28, 2018.</p> <p>“avoidable costs” means the costs that are not incurred if an asset was temporarily delisted for the obligation period or a portion of the obligation period and includes the following:</p> <p>(i) Avoidable labour expenses. Avoidable labour expenses related directly to operations and maintenance of the capacity asset. The categories of avoidable labour expenses may include:</p> <ul style="list-style-type: none"> • on-site based labour engaged in operations and maintenance activities; • off-site based labour engaged in on-site operations and maintenance activities directly related to the capacity asset; and • off-site based labour engaged in off-site operations and maintenance activities directly related to the capacity asset site. <p>(ii) Avoidable administrative expenses. The categories of avoidable administrative expenses may include:</p> <ul style="list-style-type: none"> • those incurred for employee expenses, with the exception of employee expenses included in labour expenses related directly to operations and maintenance; • environmental fees; • safety and operator training; • office supplies; • communications; and 	<p>Please see the AESO reply to Capital Power’s comment on the definition of “avoidable cost”.</p>

Stakeholder Comments and/or Proposed Alternative Definition Wording	AESO Replies
<ul style="list-style-type: none"> • annual asset testing, inspection and analysis. <p>(iii) Avoidable fuel availability expenses. Avoidable fuel availability expenses are operating expenses related directly to fuel availability and delivery for the capacity asset that are not normally included for recovery in energy and ancillary services market offers. The categories of avoidable fuel availability expenses may include:</p> <ul style="list-style-type: none"> • those incurred for fuel transportation; • costs of natural gas storage; • costs of gas balancing agreements; • costs of gas park and loan services; and • variable mining costs. <p>(iv) Avoidable maintenance expenses. Avoidable maintenance expenses are maintenance expenses related directly to the capacity asset, with the exception of those included in labour expenses related directly to operations and maintenance. The categories of avoidable maintenance expenses may include:</p> <ul style="list-style-type: none"> • those incurred for chemicals and materials consumed during maintenance of the capacity asset; and • rented maintenance equipment used to maintain the capacity asset. <p>(v) Avoidable fixed operating expenses. The categories of avoidable fixed operating expenses may include those incurred for:</p> <ul style="list-style-type: none"> • water treatment chemicals and lubricants; • water, gas and station service; • water rental; • coal or gas royalties; and • waste water treatment. <p>(vi) Avoidable taxes, fees and insurance. The categories of avoidable taxes, fees and insurance may include those incurred for:</p>	

Stakeholder Comments and/or Proposed Alternative Definition Wording	AESO Replies
<ul style="list-style-type: none"> insurance, permits and licensing fees, site security and utilities for maintaining security at the site; and property taxes. <p>(vii) Avoidable carrying charges. Avoidable carrying charges may include short-term carrying charges for maintaining reasonable levels of inventories of fuel and spare parts that result from short-term operational unit decisions as measured by industry best-practice standards.</p> <p>(viii) Avoidable asset-specific corporate level expenses. Corporate-level expenses are those expenses directly linked to providing tangible services required for the operation or maintenance of the capacity asset to the extent that temporary or permanent delisting of the capacity asset results in a cost reduction rather than a reallocation. The categories of avoidable asset-specific corporate level expenses may include those incurred for:</p> <ul style="list-style-type: none"> legal services; and regulatory and environmental compliance. 	
<p>“capacity market participant” means a person registered with the ISO to transact capacity in the capacity market in accordance with Section 201.10 of the ISO rules, <i>Capacity Market Participant Registration</i>.</p>	
<p><u>Capital Power Corporation (“Capital Power”)</u></p> <p>Capital Power supports improvements made by the AESO to this definition since its last release. As such, Capital Power has no further comments at this time.</p>	<p>The AESO acknowledges Capital Power’s comment.</p>
<p>“delist outage” means a derate or an outage for a source asset or load sink asset associated with a temporary delist referred to in Section 206.9 of the ISO rules, <i>Delisting</i>.</p> <p>[Note, the defined term “delist outage” was posted with the EAS definitions as well]</p>	
<p><u>Capital Power Corporation (“Capital Power”)</u></p> <p>The definition currently references the wrong rule; Section 206.9 is the Asset Substitution rule. Capital Power believes that the definition of “delist outage” should be enhanced to include reference to the obligations and limitations of a delisted asset in the energy and capacity market, including, but not limited to, must offer obligations in the energy market and eligibility for asset substitution and volume reallocation in the capacity market.</p>	<p>The must offer obligations in the energy market are contained in the energy market rules. Proposed Section 201.15, <i>Delisting</i> will be clarified.</p> <p>The AESO will revise the rule reference in the delist outage definition to reflect Section 201.15 of the ISO Rules, <i>Delisting</i>.</p>

Stakeholder Comments and/or Proposed Alternative Definition Wording	AESO Replies
<p>Additionally, to ensure distinction between temporary delisting (i.e. a “delist outage”) permanent delisting (i.e. retirement) the term “permanent delist” should be added to the list of defined terms for the capacity market.</p> <p>“delist outage” means a derate or an outage for a source asset or load sink asset associated with a temporary delist referred to in Section 206.9-1.15 of the ISO rules, <i>Delisting</i>.</p>	<p>The AESO does not see a need define “permanent delist”. The associated ID explains the difference between the temporary and permanent delisting.</p>
<p>“firm consumption level” means a reduction in consumption of electric energy to a maximum volume that is provided by a load asset during an obligation period.</p>	
<p><u>Alberta Federation of Rural Electrification Associations (“AFREA”)</u></p> <p>The original definition was based on a reduction which is not really relevant as a commitment. What is relevant is the level that has been agreed to. The original definition used the vague term volume which should be MW.</p> <p>“firm consumption level” means a specified reduction in consumption of electric energy to a maximum volume that is, measured in MW, agreed to be provided by a load asset during an obligation period.</p>	<p>The AESO disagrees with the changes proposed by AFREA. A load asset providing firm consumption level is not expected to consume at a certain level during an obligation period. Further information on how load assets providing firm consumption level participate can be found in the presentation and recording of the Technical Information Session held on November 1, 2018 posted on the AESO website.</p> <p>The obligations for how much firm consumption level an asset is providing are set out in the ISO rules.</p>
<p><u>Utilities Consumer Advocate (“UCA”)</u></p> <p>“Firm consumption level” and “guaranteed load reduction” should be defined separately on page two of the <i>Proposed New Capacity Market Terms and Definition</i>.</p>	<p>The AESO will correct the formatting error.</p>
<p>“guaranteed load reduction” means a reduction in consumption of electric energy by a volume that is provided by a load asset during an obligation period.</p>	
<p><u>Alberta Federation of Rural Electrification Associations (“AFREA”)</u></p> <p>The original definition used the vague term volume. It should be quantified by MW.</p> <p>“guaranteed load reduction” means a specified reduction in consumption of electric energy by a volume that is, measured in MW, agreed to be provided by a load asset during an obligation period.</p>	<p>The AESO disagrees with the changes proposed by AFREA. The obligations for how much guaranteed load reduction an asset is providing are set out in the ISO rules.</p>

Stakeholder Comments and/or Proposed Alternative Definition Wording	AESO Replies
<p>“obligation period” means a 12-month period running continuously from November 1 to October 31 of the following year.</p>	
<p><u>Alberta Federation of Rural Electrification Associations</u></p> <p>We are concerned that the one year obligation period of too short to attract new generation. We would like to see a longer obligation period for new generation.</p>	<p>Please refer to the CMD Final rationale section 5.4.</p>
<p><u>Capital Power Corporation (“Capital Power”)</u></p> <p>The definition of “obligation period” must include reference to the critical fact that the obligation period will be the same for all resources (new and existing). Equal term length is a critical design element and honors the commitments made by the Government of Alberta with respect treating existing investments fairly and is critical to ensuring a level playing field for new and existing assets.</p> <p>Additionally, it should be clear that the obligation period ends on October 31 at 11:59 pm and not 12:00 AM; October 31 is last day of the obligation period, not October 29. See proposed changes to the left.</p> <p>“obligation period” means a period of equal length for all resources during which a resource is committed to deliver capacity; 12-month period running continuously from November 1 to, and including, October 31 of the following year.</p>	<p>The AESO does not agree with Capital Power’s proposed changes regarding equal length for all resources. The CMD and proposed ISO rules for the implementation of the capacity market do not consider different terms for different assets.</p> <p>The AESO will revise the definition to incorporate Capital Power’s proposed wording to clarify the obligation period includes October 31.</p>
<p><u>Pembina Institute</u></p> <p>Please see part IV.A (paras. 85-91) of the accompanying submission to the AUC.</p> <p>“obligation period” means a 426-month period running continuously either from November 1 to October-April 31 of the following year or from May 1 to October 31.</p>	<p>The AESO disagrees with the seasonal definition of the obligation period.</p> <p>The AESO provided rationale for the selection of the annual obligation period on page 2 of the SAM work group recommendation on November 22, 2017.</p>
<p>“rebalancing auction” means an auction for capacity conducted after a base auction for the same obligation period.</p>	
<p><u>Capital Power Corporation (“Capital Power”)</u></p> <p>Capital Power supports improvements made by the AESO to this definition since its last release. As such, Capital Power has no further comments at this time.</p>	<p>The AESO acknowledges Capital Power’s comment.</p>

Stakeholder Comments and/or Proposed Alternative Definition Wording	AESO Replies
<p>“resource adequacy standard” means the minimum level of expected unserved energy established by Government of Alberta in regulation.</p>	
<p><u>Capital Power Corporation (“Capital Power”)</u></p> <p>Capital Power believes that the change to the left must be made to ensure alignment with direction provided by the Department of Energy, in its paper, “Results of the Conversation: Stakeholder Paper no. 3 – Revised Regulatory Concepts” (October 2018). That paper states that “[t]he resource adequacy standard would be set as Normalized Expected Unserved Energy at a maximum of 0.0011 per cent.” Normalized expected unserved energy is mathematically different than expected unserved energy.</p> <p>“resource adequacy standard” means the minimum level of normalized expected unserved energy established by Government of Alberta in regulation.</p>	<p>The AESO expects “resource adequacy standard” to be defined by the Government of Alberta in regulation. The AESO will align its definitions in the <i>Consolidated Authoritative Document Glossary</i> with any statutory definitions.</p>
<p><u>TransAlta Corporation (“TransAlta”)</u></p> <p>The resource adequacy standard was established based on normalized expected unserved energy, as indicated in our recommended changes to the definition in yellow highlighted text.</p> <p>“resource adequacy standard” means the minimum level of normalized expected unserved energy established by Government of Alberta in regulation.</p>	<p>Please see the AESO’s reply to Capital Power’s comment on the definition of “resource adequacy standard”.</p>
<p>“transmission market constraint” means an exceedance of a reliability limit on 1 or more elements of the transmission system, where:</p> <ul style="list-style-type: none"> (i) the ISO must take action to prevent or mitigate the exceedance; and (ii) the action results in an impact to the normal economic merit operation of generation, load, or interchange transactions, <p>excluding a circumstance where the capability limits referenced in Section 303.2 of the ISO rules, <i>Available Transfer Capability</i> are exceeded.</p> <p>[Note, the defined term “transmission market constraint” was posted with the EAS definitions as well]</p>	
<p><u>Capital Power Corporation (“Capital Power”)</u></p> <p>Capital Power does not support use of the qualifier “market” in the term “transmission market constraint” and believes it is unnecessary. The qualifier should be removed, and the term should remain as “transmission constraint”. It is unclear to Capital Power what would distinguish a “transmission market constraint” from a “transmission constraint” as currently defined in the AESO’s Consolidated</p>	<p>The AESO disagrees that a separate definition for transmission system outage is required. As described in section 3.2.2 of the CMD Final Rationale, transmission market constraints are considered exceptions to uniform capacity value calculations because the AESO is obligated to plan and make arrangements for transmission system upgrades.</p>

Stakeholder Comments and/or Proposed Alternative Definition Wording	AESO Replies
<p>Authoritative Document Glossary. If the AESO disagrees, please clarify and provide rationale for the change.</p> <p>In either case, clarity is required with respect to the impact of transmission curtailments on an asset's uniform capacity value calculated pursuant to Section 206.3 as well as its availability and delivery assessments pursuant to Section 206.8. It is Capital Power's understanding, based on its participation in the AESO's capacity market design working groups as well as its reading of CMD Final, that transmission curtailment risk in the capacity market with respect to an asset's uniform capacity value as well as its availability and delivery assessments will be borne by the AESO (with the exception of transmission outages where a capacity asset is electrically disconnected from the transmission system as result of its own actions).</p> <p>This approach makes sense because it recognizes that the AESO – in its role as the transmission system planner – is the party best able to manage the risk of transmission curtailments and it keeps capacity assets economically whole for curtailment risks outside of their control. Capital Power is concerned that drafting language in Sections 206.3 and 206.8 as well as proposed changes to the definition of “acceptable operational reason” in the energy market do not reflect the above understanding.</p> <p>To help clarify the impact of transmission curtailments on a capacity asset's uniform capacity value and availability and performance assessment, Capital Power proposes removing subsection (vii) from the proposed definition of “acceptable operational reason” and adding a new term, “transmission system outage”, to the list of defined capacity market terms in addition to the concept of “transmission (market) constraint”. See Capital Power's proposed definition below.</p> <p>“transmission market constraint” means an exceedance of a reliability limit on 1 or more elements of the transmission system, where:</p> <ul style="list-style-type: none"> (i) the ISO must take action to prevent or mitigate the exceedance; and (ii) the action results in an impact to the normal economic merit operation of generation, load, or interchange transactions, <p>excluding a circumstance where the capability limits referenced in Section 303.2 of the ISO rules, <i>Available Transfer Capability</i> are exceeded.</p>	<p>A transmission market constraint explicitly applies to situations where the AESO must take action to prevent or mitigate the exceedance of a reliability limit on 1 or more elements of the transmission system, and the action impacts the normal economic merit operation of the energy market. In the event of a transmission market constraint, the AESO must take action to mitigate the constraint as per the procedure in Section 302.1, <i>Real Time Transmission Market Constraint Management</i>.</p> <p>When a transmission-connected generator is electrically disconnected from the grid, if the generator's available capability remains at full, the merit order will not reflect the unavailability of the generator. As such, the market will not have accurate information regarding the generator's availability. The amendments to the “acceptable operational reason” definition will provide market participants with a mechanism to accurately reflect their available capability when they are electrically disconnected from the grid.</p> <p>The previous definitions of “transmission constraint” and “acceptable operational reason” created ambiguity in the electricity market for pool participants to determine whether to restate their available capability in accordance with Section 203.3, <i>Energy Restatements</i> in the event they were electrically disconnected from the grid. Combined, the two amended definitions provide market participants with clarity on the AESO's expectations for managing transmission market constraints and transmission outages where a generator is electrically disconnected from the grid.</p>

Stakeholder Comments and/or Proposed Alternative Definition Wording	AESO Replies
<p>The term “transmission system outage” should be used in conjunction with “transmission (market) constraint” in Section 206.3 and 206.8 to describe the types of transmission issues that do not impact an internal Alberta generation asset’s uniform capacity value calculation or availability and performance assessment. The term is distinct from transmission outages where a capacity asset is electrically disconnected from the transmission system as result of its own actions which would count against an asset in both instances.</p> <p>the list of defined capacity market terms in addition to the concept of “transmission (market) constraint” to increase clarity regarding a capacity asset’s transmission curtailment risk. See proposed definition to the left.</p> <p>Proposed new definition:</p> <p>“transmission system outage” means an outage on the transmission system that is beyond the control of an impacted asset and is not the result of an asset being electrically disconnected from the transmission system due to its own actions.</p>	
<p>“uniform capacity value” means a fungible measure in MW, expressed as a positive integer, of an asset’s ability to provide capacity calculated in accordance with Section 206.3 of the ISO rules, <i>Uniform Capacity Value Determination</i>.</p>	
<p><u>Capital Power Corporation (“Capital Power”)</u></p> <p>Capital Power supports improvements made by the AESO to this definition since its last release. As such, Capital Power has no further comments at this time.</p>	<p>The AESO acknowledges Capital Power’s comment.</p>
<p>Additional Terms and Definitions Proposed</p>	
<p><u>TransAlta Corporation (“TransAlta”)</u></p> <p>Please see TransAlta’s comment matrix for Section 206.3: Capacity Market Clearing.</p> <p>“load asset performance factor” means the estimated uniform capacity value divided by the maximum capability for a capacity market load asset and is set at 91%.</p>	<p>Please refer to the AESO’s reply to TransAlta’s comment on subsection 6(7) in the matrix for Section 206.3, <i>Uniform Capacity Value Calculation</i>.</p>

Stakeholder Comments and/or Proposed Alternative Definition Wording	AESO Replies
<p>TransAlta Corporation (“TransAlta”) Please see TransAlta’s comment matrix for Section 207.2: Calculation of Net-CONE. “initial Gross-CONE value” means the Gross-CONE value set for the 2021/2022 obligation period of \$244.2/kW-year.</p>	<p>Please refer to the AESO’s reply to TransAlta’s comment on subsection 3 in the matrix for Section 207.2, <i>Calculation of Net-CONE</i>.</p>
<p>TransAlta Corporation (“TransAlta”) Please see TransAlta’s comment matrix for Section 207.2: Calculation of Net-CONE. “labour index weighting” means the weighting of labour costs used in the Composite Index in Section 207: <i>Calculation of Net CONE</i> and is set at 25%.</p>	<p>Please refer to the AESO’s reply to TransAlta’s comment on subsection 4(2) in the matrix for Section 207.2, <i>Calculation of Net-CONE</i>.</p>
<p>TransAlta Corporation (“TransAlta”) Please see TransAlta’s comment matrix for Section 207.2: Calculation of Net-CONE. “labour index factor” means the starting value of the Labour Index used in the Composite Index in Section 207: <i>Calculation of Net CONE</i> and is set at 60.7.</p>	<p>Please refer to the AESO’s reply to TransAlta’s comment on subsection 4(2) in the matrix for Section 207.2, <i>Calculation of Net-CONE</i>.</p>
<p>TransAlta Corporation (“TransAlta”) Please see TransAlta’s comment matrix for Section 207.2: Calculation of Net-CONE. “material index weighting” means the weighting of material costs used in the Composite Index in Section 207: <i>Calculation of Net CONE</i> and is set at 35%.</p>	<p>Please refer to the AESO’s reply to TransAlta’s comment on subsection 4(2) in the matrix for Section 207.2, <i>Calculation of Net-CONE</i>.</p>
<p>TransAlta Corporation (“TransAlta”) Please see TransAlta’s comment matrix for Section 207.2: Calculation of Net-CONE. “material index factor” means the starting value of the Material Index used in the Composite Index in Section 207: <i>Calculation of Net CONE</i> and is set at 118.5.</p>	<p>Please refer to the AESO’s reply to TransAlta’s comment on subsection 4(2) in the matrix for Section 207.2, <i>Calculation of Net-CONE</i>.</p>

Stakeholder Comments and/or Proposed Alternative Definition Wording	AESO Replies
<p>TransAlta Corporation (“TransAlta”) Please see TransAlta’s comment matrix for Section 207.2: Calculation of Net-CONE.</p> <p>“turbine index weighting” means the weighting of turbine costs used in the Composite Index in Section 207: Calculation of Net CONE and is set at 40%.</p>	<p>Please refer to the AESO’s reply to TransAlta’s comment on subsection 4(2) in the matrix for Section 207.2, <i>Calculation of Net-CONE</i>.</p>
<p>TransAlta Corporation (“TransAlta”) Please see TransAlta’s comment matrix for Section 207.2: Calculation of Net-CONE.</p> <p>“turbine index factor” means the starting value of the Turbine Index used in the Composite Index in Section 207: Calculation of Net CONE and is set at 268.7.</p>	<p>Please refer to the AESO’s reply to TransAlta’s comment on subsection 4(2) in the matrix for Section 207.2, <i>Calculation of Net-CONE</i>.</p>
<p>TransAlta Corporation (“TransAlta”) Please see TransAlta’s comment matrix for Section 207.2: Calculation of Net-CONE.</p> <p>“reference technology average capacity” means the estimated average capacity available in the energy market and is set at 87 MW.</p>	<p>Please refer to the AESO’s reply to TransAlta’s comment on subsection 5(2) in the matrix for Section 207.2, <i>Calculation of Net-CONE</i>.</p>
<p>TransAlta Corporation (“TransAlta”) Please see TransAlta’s comment matrix for Section 207.2: Calculation of Net-CONE.</p> <p>“reference technology unavailability rate” means the estimated reduction to maximum capability for the reference technology including forced and planned outage.</p>	<p>Please refer to the AESO’s reply to TransAlta’s comment on subsection 5(2) in the matrix for Section 207.2, <i>Calculation of Net-CONE</i>.</p>
<p>TransAlta Corporation (“TransAlta”) Please see TransAlta’s comment matrix for Section 207.2: Calculation of Net-CONE.</p> <p>“reference technology heat rate” means the estimated heat rate for the reference technology and is set at 9.667 GJ/MWh.</p>	<p>Please refer to the AESO’s reply to TransAlta’s comment on subsection 5(3) in the matrix for Section 207.2, <i>Calculation of Net-CONE</i>.</p>

Stakeholder Comments and/or Proposed Alternative Definition Wording	AESO Replies
<p><u>TransAlta Corporation (“TransAlta”)</u> Please see TransAlta’s comment matrix for Section 207.2: Calculation of Net-CONE.</p> <p>“reference technology emissions intensity” means the estimated greenhouse gas emission intensity for the reference technology and is set at 0.50 tonnes of CO₂e/MWh.</p>	<p>Please refer to the AESO’s reply to TransAlta’s comment on subsection 5(3) in the matrix for Section 207.2, <i>Calculation of Net-CONE</i>.</p>
<p><u>TransAlta Corporation (“TransAlta”)</u> Please see TransAlta’s comment matrix for Section 207.2: Calculation of Net-CONE.</p> <p>“initial variable operations and maintenance” means the estimated variable operations and maintenance costs set for the 2021/2022 obligation period of \$4.60/MWh.</p>	<p>Please refer to the AESO’s reply to TransAlta’s comment on subsection 5(4) in the matrix for Section 207.2, <i>Calculation of Net-CONE</i>.</p>
<p><u>TransAlta Corporation (“TransAlta”)</u> Please see TransAlta’s comment matrix for Section 207.2: Calculation of Net-CONE.</p> <p>“reference technology performance factor” means the estimated uniform capacity value divided by the maximum capability for the reference technology and is set at 80%.</p>	<p>Please refer to the AESO’s reply to TransAlta’s comment on subsection 5(4) in the matrix for Section 207.2, <i>Calculation of Net-CONE</i>.</p>
<p>General Comments <u>Alberta Federation of Rural Electrification Associations (“AFREA”)</u> Please consider adding definitions of the various forms of delists to the list of terms and definitions and use those defined terms where appropriate.</p>	<p>The AESO does not consider it necessary to define the various forms of delists as the ISO rule language provides the required context.</p>