

Stakeholder Comments and AESO Replies Matrix



Proposed Amended Section 201.3 of the ISO Rules, *Energy Market Offer Control Information*

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
Offer Control Information Subsection 2(1)	
<p><u>Capital Power Corporation (“Capital Power”)</u></p> <p>Capital Power understands that only the AESO submits bids in the operating reserve market. Since the AESO doesn’t accept bids, the term should be removed from the subsection.</p> <p>Subsection 2(1)(b)</p> <ul style="list-style-type: none"> in the case of operating reserve, for all offers or bids which the ISO accepts. 	<p>This change is outside the scope of required ISO rule amendments for the implementation of the capacity market. The AESO expects to incorporate this change in a separate filing.</p>
Associates of a Market Participant Subsection 3(1)	
<p><u>Capital Power Corporation (“Capital Power”)</u></p> <p>From the phrase “in the manner the ISO specifies” at subsection 3 of the proposed amended rule, it remains unclear what information regarding the associate must be provided and how it is expected to be transmitted. Consequently, Capital Power recommends that the AESO develop an information document outlining the process and form for the submission of information related to associates including an example of this submission. Among other things, it would be helpful to market participants if the AESO can confirm that associates include and relate only to those assets that participate in Alberta.</p> <p>Subsection 3(1)</p> <ul style="list-style-type: none"> Submission method must be clarified. 	<p>The details regarding how participants will submit offer control information is subject to the AESO’s IT implementation project and will be provided in an Information Document as soon as the AESO has more information available. Offer control information, by definition, is limited to parties that have control over offers or bids in Alberta’s energy market.</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 201.3 of the ISO Rules, <i>Energy Market Offer Control Information</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 changes relate to the implementation and operation of the capacity market.	The AESO acknowledges Capital Power’s comment.
2	whether you agree that Section 201.3 of the ISO Rules, <i>Energy Market Offer Control Information</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 201.3 of the ISO Rules, <i>Energy Market Offer Control Information</i> and whether, in your view, Section 201.3 of the ISO Rules, <i>Energy Market Offer Control Information</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 201.3 of the ISO Rules, <i>Energy Market Offer Control Information</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 201.3 of the ISO Rules, <i>Energy Market Offer Control Information</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 amendments to this ISO rule. As such, Capital Power has no comments at this time.	

6	whether you agree with Section 201.3 of the ISO Rules, <i>Energy Market Offer Control Information</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 201.3 of the ISO Rules, <i>Energy Market Offer Control Information</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.	