

Stakeholder Comments and AESO Replies Matrix



Proposed Amended Section 202.3 of the ISO Rules, *Issuing Dispatches for Equal Prices*

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
Equally-Priced Operating Blocks Subsection 2(4)	
<p><u>Capital Power Corporation (“Capital Power”)</u></p> <p>The current language appears to reference operating policies and procedures that are no longer in effect. This should be replaced by the appropriate section of the ISO rules, which Capital Power understands is current ISO Rule section 203.6 - <i>Available Transfer Capability and Transfer Path Management</i>.</p> <p>Subsection 2(4)</p> <ul style="list-style-type: none"> Notwithstanding subsections 2(1), 2(2), and 2(3), the ISO must determine dispatch volumes for a pool asset that is an import asset or an export asset in accordance with the procedures set out in ISO Rule section 203.6 - Section 203.6 Available Transfer Capability and Transfer Path Management. OPP 301, Alberta-BC Interconnection Scheduling and OPP 302, Alberta-Saskatchewan Interconnection Scheduling; and 	<p>The change suggested by Capital Power is outside the scope of required ISO rule amendments for the implementation of the capacity market. The AESO has incorporated this change in a separate consultation for the category 2 rules, as posted on the AESO website.</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 202.3 of the ISO Rules, <i>Issuing Dispatches for Equal Prices</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 202.3 of the ISO Rules, <i>Issuing Dispatches for Equal Prices</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 202.3 of the ISO Rules, <i>Issuing Dispatches for Equal Prices</i> and whether, in your view, Section 202.3 of the ISO Rules, <i>Issuing Dispatches for Equal Prices</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 202.3 of the ISO Rules, <i>Issuing Dispatches for Equal Prices</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 202.3 of the ISO Rules, <i>Issuing Dispatches for Equal Prices</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 202.3 of the ISO Rules, <i>Issuing Dispatches for Equal Prices</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 202.3 of the ISO Rules, <i>Issuing Dispatches for Equal Prices</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.	