

Stakeholder Comments and AESO Replies Matrix



Proposed Amended Section 202.7 of the ISO Rules, *Markets Suspension or Limited Markets Operations*

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
Declaration Invoking a State of Limited Markets Operations Subsection 3(1)	
<p><u>Capital Power Corporation (“Capital Power”)</u></p> <p>It is unclear what benefit removing this provision would have for market participants and load. Accordingly, Capital Power recommends reinstating the existing language unless the AESO clarifies why it is proposing to remove this requirement.</p> <p>Subsections 3(1)(c) and 9(1)(c)</p> <ul style="list-style-type: none"> • a reasonable estimate of the anticipated date and time of termination of the state of limited market operations, and the return to ordinary course markets operations. 	<p>The AESO does not intend to proceed with the removal of subsections 3(1)(c) and 9(1)(c) at this time. The <i>Consolidated Blacklines for ISO Rules & Definitions for the Energy Market, Aug 2018 – Oct 2018</i> posted shortly after October 22, 2018 inadvertently included the removal of subsections 3(1)(c) and 9(1)(c). Please see the version of Section 202.7 that was posted to the AESO website on October 22, 2018.</p>
Declaration Invoking a State of Markets Suspension Subsection 9(1)	
<p><u>Capital Power Corporation (“Capital Power”)</u></p> <p>It is unclear what benefit removing this provision would have for market participants and load. Accordingly, Capital Power recommends reinstating the existing language unless the AESO clarifies why it is proposing to remove this requirement.</p> <p>Subsections 3(1)(c) and 9(1)(c)</p> <ul style="list-style-type: none"> • a reasonable estimate of the anticipated date and time of termination of the state of limited market operations, and the return to ordinary course markets operations. 	<p>Please see the AESO’s reply to Capital Power’s comment on subsection 3(1) above.</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 202.7 of the ISO Rules, <i>Market Suspension or Limited Markets Operations</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 202.7 of the ISO Rules, <i>Market Suspension or Limited Markets Operations</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 202.7 of the ISO Rules, <i>Market Suspension or Limited Markets Operations</i> and whether, in your view, Section 202.7 of the ISO Rules, <i>Market Suspension or Limited Markets Operations</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 202.7 of the ISO Rules, <i>Market Suspension or Limited Markets Operations</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 202.7 of the ISO Rules, <i>Market Suspension or Limited Markets Operations</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 202.7 of the ISO Rules, <i>Market Suspension or Limited Markets Operations</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 202.7 of the ISO Rules, <i>Market Suspension or Limited Markets Operations</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.	