

Stakeholder Comments and AESO Replies Matrix



Proposed Amended Section 203.1 of the ISO Rules, *Offers and Bids for Energy*

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>Must-Offer and May-Offer</p> <p>Subsection 3(1)</p>	
<p><u>Capital Power Corporation (“Capital Power”)</u></p> <p>Capital Power understands that load sink assets are to submit bids and, therefore, suggests that the term “bid” be added for consistency.</p> <p>Subsection 3 – “Must-Offer/Bid” and “May-Offer/Bid”</p> <p>Capital Power understands that load sink assets are to submit bids and, therefore, suggests that the term “bids” be added for consistency.</p> <p>Subsection 3(1)</p> <ul style="list-style-type: none"> A pool participant must submit offers or bids in the energy market for each settlement interval, for each of its pool assets, that are: <p>The proposed draft rule language appears to now be extending the applicability of the “must-offer” requirement to import assets regardless of capacity commitment. Capital Power reiterates its previously submitted comments from September 28 – the “must-offer” requirement should not apply to resources without a capacity commitment which includes non-cleared import assets.</p> <p>Subsection 3(1)(a)</p> <ul style="list-style-type: none"> generating source assets subject to a capacity commitment with a maximum capability of 5 MW or greater; 	<p>The AESO does not agree with Capital Power’s suggested changes. Load assets that have a capacity commitment submit offers in the energy market in accordance with the requirements in subsection 3. Load assets that do not have a capacity commitment may continue to submit bids in the energy market in accordance with subsection 8.</p> <p>The AESO does not agree with Capital Power’s proposal. See subsection 10.2.1 in the CMD Final Rationale for the must offer rationale for generating source assets.</p> <p>Import assets that are subject to a capacity commitment are required to submit volumes that are equal to or greater than the import asset’s capacity commitment volume (unless they have an acceptable operational reason). Import assets without a capacity commitment are required to submit offers, but the volume associated with the offer may be 0 MW (no acceptable operational reason required prior to T-2).</p>

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<p>Subsection 3(1)(d)</p> <ul style="list-style-type: none"> import assets subject to a capacity commitment. 	<p>Please see subsection 6(b) of Proposed Section 203.1 for clarity.</p>
<p>Subsection 3(2)</p>	
<p><u>Capital Power Corporation (“Capital Power”)</u></p> <p>For consistency with subsection 3(1) and to be inclusive of load sink assets, Capital Power recommends the proposed language in the adjacent cell.</p> <p>Subsection 3(2)</p> <ul style="list-style-type: none"> A pool participant may submit offers or bids in the energy market for each settlement interval, for each of its pool assets, that are: 	<p>The submission of offers in each settlement interval is addressed in subsection 3(5). Please see the AESO’s reply to Capital Power’s comment on subsection 3(1) above.</p>
<p>Available Capability</p> <p>Subsection 6</p>	
<p><u>Capital Power Corporation (“Capital Power”)</u></p> <p>Capital Power understands that load sink assets are to submit bids and, therefore, suggests that the term “bids” be added for consistency.</p> <p>Subsection 6</p> <ul style="list-style-type: none"> A pool participant that submits an offer or bid must also submit the available capability, in MW, where: 	<p>Please see the AESO’s reply to Capital Power’s comment on subsection 3(1) above.</p>
<p>Operating Constraints for Offers</p> <p>Subsection 7(1)</p>	
<p><u>Capital Power Corporation (“Capital Power”)</u></p> <p>Capital Power understands that load sink assets are to submit bids and, therefore, suggests that the term “bids” be added for consistency.</p>	<p>Please see the AESO’s reply to Capital Power’s comment on subsection 3(1) above.</p>

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<p>Subsection 7(1)</p> <ul style="list-style-type: none"> A pool participant that submits an offer or bid must also submit the following operating constraints 	
<p>Option to Bid</p> <p>Subsection 8</p>	
<p><u>Capital Power Corporation (“Capital Power”)</u></p> <p>Capital Power recommends relocating the language of this subsection to subsection 3(2) as the option to bid and requirements regarding “May-offer/bid” are clearly related. Having these details in the same subsection would also improve rule clarity.</p> <p>Subsections 8 – Option to Bid</p> <ul style="list-style-type: none"> Consider relocating this requirement to subsection 3(2) regarding must-offer/bid and may-offer/bid for consistency. 	<p>Please see the AESO’s reply to Capital Power’s comment on subsection 3(1) above.</p>
<p>Bid Content</p> <p>Subsection 9(1)</p>	
<p><u>Capital Power Corporation (“Capital Power”)</u></p> <p>Capital Power recommends reorganizing the structure of the proposed draft rule regarding the offer and bid content to improve coherence and continuity. Also, it is unclear what the AESO means by “peak load” at subsection 9(2) and, as such, should include this as a defined term.</p> <p>Subsections 9 – Bid Content</p> <ul style="list-style-type: none"> Consider relocating this subsection 9 immediately after subsection 4 - <i>Offer Content</i> as well as removing all bid-related elements from subsection 4 and placing it into subsection 9. Alternatively, the offer bid content subsections could be merged. <p>Subsection 9(2)</p> <ul style="list-style-type: none"> A pool participant that submits a bid must ensure that the total MW in the bid do not exceed the peak load of the load sink asset. 	<p>Please see the AESO’s reply to Capital Power’s comment on subsection 3(1) above.</p> <p>Since bidding is voluntary, the peak load is the peak consumption that a load asset is willing to reduce in the energy market. This value may be submitted to the AESO in the load asset request form found on the AESO’s 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 203.1 of the ISO Rules, <i>Offers and Bids for Energy</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 203.1 of the ISO Rules, <i>Offers and Bids for Energy</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 203.1 of the ISO Rules, <i>Offers and Bids for Energy</i> and whether, in your view, Section 203.1 of the ISO Rules, <i>Offers and Bids for Energy</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 203.1 of the ISO Rules, <i>Offers and Bids for Energy</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 203.1 of the ISO Rules, <i>Offers and Bids for Energy</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 203.1 of the ISO Rules, <i>Offers and Bids for Energy</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 203.1 of the ISO Rules, <i>Offers and Bids for Energy</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.	