

Stakeholder Comments and AESO Replies Matrix



Proposed Amended Section 203.6 of the ISO Rules, *Market Requirements for Interchange Transactions*

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| 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 |
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| <p>Submission of E-tags by Pool Participants Subsection 4(2)</p> | |
| <p><u>Powerex Corp</u></p> <p>So long as there are no negative impacts to competition, E-tags should be allowed to be submitted prior to being dispatched.</p> <p>This will allow pool participants to reduce the administrative cost and reduce compliance risk associated with in-the-hour dispatch of interties.</p> <p>The details on how to submit an E-tag pre-dispatch without negatively impacting competition is best established via stakeholder engagement.</p> <p>4(2) A pool participant that submits an offer or bid for a settlement interval must comply with the following:</p> <ul style="list-style-type: none"> (a) submit an e-tag only pursuant to a dispatch that the ISO issues for an offer priced between \$0.01 and \$999.99 and a bid priced between \$0.00 and \$999.98; (b) submit or adjust an e-tag as soon as reasonably practicable upon receipt of or continuation of a dispatch; (c) ensure that the e-tag is aligned with the dispatch volume for energy or ancillary services; and (d) take all actions required to ensure that the start of the schedule in the e-tag begins as soon as reasonably practicable, but no earlier than the effective time of the dispatch and no later than 40 minutes after the instruction time of the dispatch. | <p>The AESO does not agree with Powerex's proposed change. The AESO does not believe that there is an appreciable compliance risk or administrative burden associated with intra-hour dispatch of interties. A market participant may choose to price their offer at \$0.00 and submit e-tags in advance of dispatch.</p> |

| Stakeholder Comments and/or Proposed Alternative Rule Wording | AESO Replies |
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| Restatements Subsection 5 | |
| <p><u>Morgan Stanley Capital Group Inc.</u></p> <p>MSCG agrees with the proposed change because it is consistent with the ISO Rule Proposal Form submitted to the AESO Rule Proposal Staff on October 9, 2018, confirming that importers are not required to submit restatements when transmission service is curtailed directly by the balancing authority, i.e. AESO.</p> <p>Further to this, we would like to request clarification as to whether this also applies in instances where pool participants receive the Available Transfer Capability restatement allocations directly from the AESO. While this instance is similar to the curtailment of available transmission capacity, and pursuant to our rule proposal, we believe Available Transfer Capability and curtailments should be afforded the same treatment, we were not able to find a reference to Available Transfer Capability restatements in the proposed language.</p> <p>To the extent that these proposed amendments will not go into effect until 2021, we would like to request expedited clarification on the proposed amendment we have put forth on October 9, 2018; specifically, in cases where the importers receive the Available Transfer Capability restatement allocations directly from the AESO, or curtailment of E-tags directly by the AESO post T-20, that the balancing authority is sufficiently equipped with the necessary restatement information; and therefore, in these cases restatement of the schedule would not be required.</p> | <p>The AESO confirms that available capability restatements will not be required by the pool participant for curtailments or ATC restatements made directly by the AESO.</p> <p>The AESO's response to Morgan Stanley's proposed rule amendment will be provided through the ISO Rule Proposal process.</p> |

Please provide your comments on the following (as set out in AUC Rule 017 s. 13(b-j)):

| Item # | | Stakeholder comments | AESO Replies |
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| 1 | whether you agree that Section 203.6 of the ISO Rules, <i>Market Requirements for Interchange</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. |
| | | <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. |
| 2 | whether you agree that Section 203.6 of the ISO Rules, <i>Market Requirements for Interchange</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 has no comments at this time. | |
| 3 | whether you understand and agree with the objective or purpose of Section 203.6 of the ISO Rules, <i>Market Requirements for Interchange</i> and whether, in your view, Section 203.6 of the ISO Rules, <i>Market Requirements for Interchange</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 203.6 of the ISO Rules, <i>Market Requirements for Interchange</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. | |

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| 5 | your views on any analysis conducted or commissioned by the AESO supporting Section 203.6 of the ISO Rules, <i>Market Requirements for Interchange</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 203.6 of the ISO Rules, <i>Market Requirements for Interchange</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 203.6 of the ISO Rules, <i>Market Requirements for Interchange</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. | |