

# Stakeholder Comments and AESO Replies Matrix



## Proposed Amended Section 306.9 of the ISO Rules, *Outage Cancellation Procedures*

**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><b>Authority to Issue an Outage Cancellation Directive</b>  <b>Subsection 2(1)</b></p>	
<p><u>The Cogeneration Working Group (“CWG”)</u>                      An outage cannot be canceled simply on the possibility of 1 MWh of unserved energy. The minimum expected unserved energy concept implies a range and in some cases within the distribution the unserved energy will exceed that expected level. A specific test should be specified, i.e. if the expected unserved energy during the specified interval exceeds 1000 MWh the outage can be cancelled. In effect, necessary level of adequacy needs to be defined in terms of this rule.</p>	<p>The AESO does not agree with CWG’s recommendation for a specific test.                      The AESO’s assessment for determining whether to cancel an outage is based on the calculation in subsection 2 of Section 202.6 <i>Adequacy of Supply</i>. The resource adequacy standard assessment which references expected unserved energy is not used for the determination of the need for an outage cancellation.                      In order to effectively manage system reliability, the AESO must retain the ability to exercise its judgment with respect to whether there may be a high probability of a supply adequacy or shortfall event that causes concern from a reliability perspective.</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 306.9 of the ISO Rules, <i>Outage Cancellation Procedures</i> relates to the capacity market and why or why not	<p><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.</p>	The AESO acknowledges Capital Power’s comment.
2	whether you agree that Section 306.9 of the ISO Rules, <i>Outage Cancellation Procedures</i> should or should not be in effect for a fixed term and why or why not	<p><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.</p>	The AESO acknowledges Capital Power’s comment.
3	whether you understand and agree with the objective or purpose of Section 306.9 of the ISO Rules, <i>Outage Cancellation Procedures</i> and whether, in your view, Section 103.9, <i>Capacity Market Financial Settlement</i> meets the objective or purpose	<p><u>Capital Power Corporation (“Capital Power”)</u>            Capital Power has no comments at this time.</p>	
4	how, in your view, Section 306.9 of the ISO Rules, <i>Outage Cancellation Procedures</i> affects the performance of the capacity market and the electricity market	<p><u>Capital Power Corporation (“Capital Power”)</u>            Capital Power has no comments at this time.</p>	
5	your views on any analysis conducted or commissioned by the AESO supporting Section 306.9 of the ISO Rules, <i>Outage Cancellation Procedures</i>	<p><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.</p>	

6	whether you agree with Section 306.9 of the ISO Rules, <i>Outage Cancellation Procedures</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 306.9 of the ISO Rules, <i>Outage Cancellation Procedures</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.	