

Stakeholder Comment Matrix – August 8, 2019
Development of Proposed Amended Section 305.1 of the ISO rules, *Energy Emergency Alerts* (‘Section 305.1’)



Period of Comment: August 8, 2019 through August 23, 2019 Comments From: ATCO Power Ltd. (ATCO Power) Date: 2019/08/23	Contact: Kurtis Glasier, Regulatory Advisor Phone: (587) 228-9617 Email: Kurtis.Glasier@atco.com
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The AESO is seeking comments from Stakeholders on the development of proposed amended Section 305.1 with regard to the following matters:

	Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
1.	Do you agree or disagree that the issue identified requires the development of proposed amended Section 305.1? Please comment.	Please see comments below.
2.	Do you agree or disagree with the potential objective or purpose of proposed amended Section 305.1? Please comment.	The purpose of the proposed amendment is to “remove duplicative content between Section 305.1 and the Alberta version of NERC EOP-011-1”. The Alberta version of NERC EOP-011-1 has yet to be developed and therefore ATCO Power is unable to comment at this time. If duplicative content exists, then ATCO Power agrees that the purpose of the amendments to Section 305.1 should be to remove the duplication. However, to the extent that Section 305.1 requires the AESO to provide more information about the market than contemplated in the NERC standard, this aspect should be either retained as a separate rule or incorporated into the Alberta version of the NERC standard.
3.	Do you agree or disagree with the proposed form of consultation and timelines? Please comment.	ATCO Power recommends that the consultation for Section 305.1 and NERC EOP-011-1 should be combined. Due to the relationship identified by the AESO in the “Background” section of the Letter of Notice, it would be efficiency enhancing if the consultations for Section 305.1 and NERC EOP-011-1 were combined with the consultations for NERC PRC-006-3 and OPP 804. If there are material or significant concerns identified in the written process in October 2019, the AESO should hold an in-person session to discuss with stakeholders the identified concerns. Since stakeholders have not been presented with the proposed NERC EOP-011-1 nor the proposed amendments for Section 305.1, it is hard to

		comment on whether further consultation will be required.
4.	Do you intend to participate in any related written consultation?	ATCO Power intends to participate in any further consultation. See comment above pertaining to the potential need for an in-person stakeholder session.
5.	Do you have any additional comments?	<p>ATCO Power does not agree with the proposed reporting of emergency alerts outlined in the capacity market consultations. The proposed blackline of Section 305.1 dated August 3, 2019 removes the requirement for the AESO to identify the level of emergency alert (EEA1, EEA2, or EEA3). Scarcity reporting and energy emergency alerts are inherently valuable to market participants and policy makers.</p> <p>Market participants benefit from knowing when an EEA1 event occurs, so they can prepare for EEA2 and EEA3 events. Today, ATCO Power uses the escalating levels to take different steps at its plants and as a warning that its real time desk may be required to activate reserves.</p> <p>Further, reporting of energy emergency alerts is pertinent given the Government's decision to retain an energy-only market. ATCO Power believes that it is critical that there be transparency about emergency alerts that may threaten grid reliability. Energy emergency alert 3 (EEA3) involves the curtailment of firm load which may have broad policy implications for the market. These events are very rare in Alberta. ATCO Power recommends that the AESO should be required to reflect the conditions of the market through transparent reporting of energy emergency alerts and AESO procedures at each level of alert in the proposed authoritative documents.</p> <p>More broadly, ATCO Power is concerned about the AESO relying on consultation that was proposed for a different purpose, specifically the Capacity Market consultation. The capacity market consultation was primarily for the set of ISO Rules that were required for the initial implementation of the capacity market. The consultation record identified by the AESO in the Letter of Notice was within the context of a capacity market design. For instance, the blackline changes of "market participant" to "electricity market participant" are no longer warranted given the continuance of the energy-only wholesale electricity market.</p>