Comprehensive Market Design Stakeholder Comment Matrix Energy and Ancillary Services WG – FINAL



Please complete this matrix by February 27, 2018, and upload it to the <u>"Feedback" folder</u> on the CMD SharePoint site. The AESO will post all comment matrices received from working group members on <u>www.aeso.ca</u>. **Please note that the names of the parties submitting each completed comment matrix will be included in this posting.** The AESO does not intend to respond to individual submissions. If you have any questions about this comment matrix, please email <u>capacitymarket@aeso.ca</u>



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Date: February 22, 2018

CMD Key Design Questions	Comments and / or Recommendations
Offer Obligations, Dispatch, and Scheduling: Are there any issues or gaps / in the CMD proposal for intra hour scheduling and priced import assets?	Import power should be treated the same as generation within Alberta and should be allowed to set the pool price. This would increase market competition, resulting in more competitive prices and a more efficient market.
Offer Obligations, Dispatch, and Scheduling: Assuming imports can be scheduled and priced intra-hour, can you support that capacity committed imports must offer their capacity volumes?	Import power should be treated the same as Alberta generation and be subject to the must offer requirement per ISO rules.
 3. Flexibility and Price Fidelity: a. Any concerns with addressing ramp by block and dispatch tolerance to address system variability? b. Any concerns with shorter settlement at 15 minutes? 5 minutes? c. Any options missing from the options to evaluate to address variability? d. Any unintended consequences with optimization look ahead or pre-dispatch? e. Any comments on ramp product? 4. Any comments on co-optimization (EAS) in the context of SCED model? Note: The AESO will continue the analysis on the options for flexibility and present at the next WG session in April. 	AltaLink supports the use of shorter settlement periods to better reflect the value and price fidelity from the flexibility of different resources. Changes made to the Alberta energy market should consider compatibility with other markets, such as the Western EIM, to avoid potential seams issues with other markets.



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 5. Market Power Screen and Mitigation: Can you support the proposal for ex ante mitigation as stated (RSI and scarcity screen and conduct threshold), specifically: a. Are there issues with 0.9 RSI that warrant further consideration? b. Are there any issues with the revised RSI formula? Is it required? c. Are there any issues / unintended consequences with additional scarcity screen? d. Are there any issues with a conduct threshold at 3x? Are there better alternatives? e. Are there any issues with opportunity cost exceptions? Any input for formulae / evaluation? 	No Comment
 Roadmap: A fulsome roadmap will be presented to the April WG. The rules required for 2021 and taken out of scope have been identified. Rules that may be delayed or phased in will be identified at that time. a. Can you support the efficiency pieces taken out of scope (SCUC, BDAM, co-optimization)? (See section 10.4) b. Scope: Can you support the pricing pieces taken out of scope (price cap, shortage pricing, negative pricing) 	No Comment



General Comments: Any comments on relevant scope areas of the CMD that are not addressed above