Stakeholder Comment Matrix – September 7, 2018

Proposed Amended ISO rules:

Section 201.1, *Pool participant Registration;*
Section 204.2, *Issuing Dispatches for Dispatch Down Service*
Section 302.1, *Real Time Transmission Constraint Management*
Section 306.3, *Load Planned Outage Reporting*
Section 306.4, *Transmission Outage Reporting and Coordination*
Section 505.2, *Performance Criteria for Refund of Generating Unit Owner's Contribution*

Period of Comment:	September 7, 2018	through	September 28, 2018	**Contact:**	Hao Liu
Comments From:	AltaLink			**Phone:**	403-267-2128
Date [yyyy/mm/dd]:	2018/10/05			**Email:**	Hao.liu@altalink.ca

Please provide comments relating to the subsection of the proposed rule in the corresponding box. Please include any views on whether the language clearly articulates the requirement for either the AESO or a market participant, and provide any proposed alternative wording.

Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
The AESO is seeking comments from Stakeholders on the development of the following proposed amended ISO rules: **i. Section 305.4 *System Security*** **ii. Section 501.10 *Transmission Loss Factors*** **iii. Section 502.9 *Synchrophasor Measurement Unit Technical Requirements*** **iv. Section 507.1 *Open Access Requirement for Proposed Interties*** **with regard to the following matters:**	
1. Do you agree or disagree with the proposed amended ISO rules: Section 201.1, *Pool participant Registration;* Section 204.2, *Issuing Dispatches for Dispatch Down Service;* Section 302.1, *Real Time Transmission Constraint Management;* Section 306.3, *Load Planned Outage Reporting;* Section 306.4, *Transmission Outage Reporting and Coordination; and*	As per the reason stated below, AltaLink does not support the new requirement of a four (4) year outage plan in the proposed amendment to Section 306.4 Transmission Outage Reporting and Coordination.

Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
Section 505.2, *Performance Criteria for Refund of Generating Unit Owner's Contribution*? If you disagree, please provide comments.	
2. Are there any subsections where the language does not clearly articulate the requirement for either the AESO or a market participant? If yes, please indicate the subsections and suggest language that would improve the clarity.	
3. Do you have any additional comments?	Given that GTA proceedings are filed for two years' worth of work, and outages cannot be defined until the scope of the work is confirmed and coordinated with the impacted stakeholders, TFOs cannot provide a 4 year outage plan.

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

Item #		Stakeholder comments
1	whether you agree that amended ISO rules: Section 201.1, *Pool participant Registration;* Section 204.2, *Issuing Dispatches for Dispatch Down Service;* Section 302.1, *Real Time Transmission Constraint Management;* Section 306.3, *Load Planned Outage Reporting;* Section 306.4, *Transmission Outage Reporting and Coordination; and* Section 505.2, Performance Criteria for Refund of Generating Unit Owner's Contribution relates to the capacity market and why or why not	
2	whether you agree that amended ISO rules: Section 201.1, *Pool participant Registration;* Section 204.2, *Issuing Dispatches for Dispatch Down Service;* Section 302.1, *Real Time Transmission Constraint Management;* Section 306.3, *Load Planned Outage Reporting;* Section 306.4, *Transmission Outage Reporting and Coordination; and* Section 505.2, Performance Criteria for Refund of Generating Unit Owner's Contribution should [or should not] be in effect for a fixed term and why or why not	

Item #		Stakeholder comments
3	whether you understand and agree with the objective or purpose of amended ISO rules: Section 201.1, *Pool participant Registration;* Section 204.2, *Issuing Dispatches for Dispatch Down Service;* Section 302.1, *Real Time Transmission Constraint Management;* Section 306.3, *Load Planned Outage Reporting;* Section 306.4, *Transmission Outage Reporting and Coordination; and* Section 505.2, Performance Criteria for Refund of Generating Unit Owner's Contribution and whether, in your view, these amended ISO rules meets the objective or purpose	
4	how, in your view, amended ISO rules: Section 201.1, *Pool participant Registration;* Section 204.2, *Issuing Dispatches for Dispatch Down Service;* Section 302.1, *Real Time Transmission Constraint Management;* Section 306.3, *Load Planned Outage Reporting;* Section 306.4, *Transmission Outage Reporting and Coordination; and* Section 505.2, Performance Criteria for Refund of Generating Unit Owner's Contribution affects the performance of the capacity market and the electricity market	

Item #		Stakeholder comments
5	your views on any analysis conducted or commissioned by the AESO supporting amended ISO rules: Section 201.1, *Pool participant Registration;* Section 204.2, *Issuing Dispatches for Dispatch Down Service;* Section 302.1, *Real Time Transmission Constraint Management;* Section 306.3, *Load Planned Outage Reporting;* Section 306.4, *Transmission Outage Reporting and Coordination; and* Section 505.2, Performance Criteria for Refund of Generating Unit Owner's Contribution	
6	whether you agree with amended ISO rules: Section 201.1, *Pool participant Registration;* Section 204.2, *Issuing Dispatches for Dispatch Down Service;* Section 302.1, *Real Time Transmission Constraint Management;* Section 306.3, *Load Planned Outage Reporting;* Section 306.4, *Transmission Outage Reporting and Coordination; and* Section 505.2, Performance Criteria for Refund of Generating Unit Owner's Contribution taken together with all ISO rules and in light of the principle of a fair, efficient and openly competitive market	

Item #		Stakeholder comments
7	whether you would suggest any alternatives to amended ISO rules: Section 201.1, *Pool participant Registration;* Section 204.2, *Issuing Dispatches for Dispatch Down Service;* Section 302.1, *Real Time Transmission Constraint Management;* Section 306.3, *Load Planned Outage Reporting;* Section 306.4, *Transmission Outage Reporting and Coordination; and* Section 505.2, Performance Criteria for Refund of Generating Unit Owner's Contribution	
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	
9	whether you agree that the proposed provisional rule supports the public interest and why or why not	

Please provide your views on the type of content that should be included in information documents associated with amended ISO rules – Section 201.1, Pool participant Registration, Section 204.2, Issuing Dispatches for Dispatch Down Service, Section 302.1, Real Time Transmission Constraint Management, Section 306.3, Load Planned Outage Reporting, Section 306.4, Transmission Outage Reporting and Coordination, and Section 505.2, Performance Criteria for Refund of Generating Unit Owner's Contribution.

Stakeholder Comment Matrix – September 7, 2018

Proposed New ISO rule – 206.8, *Obligation Period Performance Assessments*

Period of Comment:	September 7, 2018	through	September 28, 2018	**Contact:**	Hao Liu
Comments From:	AltaLink			**Phone:**	403-267-2128
Date [yyyy/mm/dd]:	2018/09/28			**Email:**	Hao.liu@altalink.ca

Please provide comments relating to the subsection of the proposed rule in the corresponding box. Please include any views on whether the language clearly articulates the requirement for either the AESO or a market participant, and provide any proposed alternative wording by blacklining the proposed language below.

Section	Subsection	Proposed language	Stakeholder comments
		Applicability	
1		Section 206.8 applies to: (a) the **ISO**.	
		Requirements **Availability Hours during an Obligation Period**	
2	**(1)**	The **ISO** must select 250 hours from each **obligation period** to assess availability as follows: (a) calculate the supply cushion for every hour in an **obligation period**; (b) rank all hours based on supply cushion in ascending order; (c) within the order referred to in subsection 2(1)(b), rank hours with equivalent supply cushion in ascending order from the most recent to the most distant of time; and (d) select the first 250 hours after ranking in accordance with subsection 2(1)(b) and 2(1)(c).	
2	**(2)**	The **ISO** must, in order to establish the availability hours for an asset, remove the following	

Section	Subsection	Proposed language	Stakeholder comments
		hours from the 250 hours identified in subsection 2(1) on an asset-specific basis: (a) hours in which there was a state of markets suspension; and (b) hours that the **ISO** determines that the asset is affected by an event of limited markets operations, war, invasion, armed conflict, blockade, act of public enemy, riot, revolution, insurrection, act of terrorism, sabotage, act of vandalism, fire that does not originate at the asset, lightning, explosion, earthquake or flooding.	
		Delivery Hours for a Settlement Period	
3	**(1)**	The **ISO** must select hours to assess delivery for a **settlement period** by identifying any hours or portions thereof in which a supply shortfall has occurred and the **ISO** has declared an energy emergency event in accordance with Section 305.1 of the **ISO rules**, *Energy Emergency Alerts*.	
3	**(2)**	The **ISO** must, in order to establish the delivery hours for an asset, remove the following hours from the hours selected in subsection 3(1) on an asset-specific basis: (a) hours in which there was a state of markets suspension; and (b) hours that the **ISO** determines that the asset was affected by an event of limited markets operations, war, invasion, armed conflict, blockade, act of public enemy, riot, revolution, insurrection, act of terrorism, sabotage, act of vandalism, fire that does not originate at the asset, lightning, explosion, earthquake or flooding.	
		Look-back Baseline for a Load Asset Providing a Firm Consumption Level	
4		The **ISO** must, for each of the availability hours established in subsection 2(2), calculate the look-back baseline as a volume in MW for a load asset as follows: (a) identify the **metered energy** for the **settlement intervals** with the same **hour ending** as the availability hour in the **days** which must be either: (i) the 15 most recent **business days** prior to the **day** with the availability hour if the availability hour falls on a **business day**; (ii) the 10 most recent weekend **days** or holidays prior to the **day** with the	

Section	Subsection	Proposed language	Stakeholder comments
		availability hour if the availability hour falls on a weekend **day** or a holiday; or (iii) the **days** the **ISO** specifies if, in the 45 **day** period prior to the **day** with the availability hour, there are fewer than 15 **business days** and 10 weekend **days** when **days** containing **settlement intervals** identified in subsection 4(b) are excluded; (b) determine if any **settlement intervals** referred to in subsection 4(a) contain: (i) any of the availability hours established in subsection 2(2); or (ii) any of the delivery hours established in subsection 3(2); and (c) calculate the average of the **metered energy** for the **settlement intervals** referred to in subsection 4(a) excluding the **metered energy** for the **settlement intervals** identified in subsection 4(b).	
		Delivery Baseline for a Load Asset Providing Guaranteed Load Reduction	
5	**(1)**	The **ISO** must, for each of the delivery hours established in subsection 3(2), calculate the standard baseline in MW as follows: (a) identify the **days** for the calculation which must be either: (i) the 10 most recent **business days** prior to the **day** with the delivery hour if the delivery hour falls on a **business day**; (ii) the 5 most recent weekend **days** or holidays prior to the **day** with the delivery hour if the delivery hour falls on a weekend **day** or a holiday; or (iii) the **days** the **ISO** specifies if, in the 35 **day** period prior to the **day** with the delivery hour, there are fewer than 10 **business days** and 5 weekend **days** when **days** identified in subsection 5(1)(b) are excluded or replaced; (b) exclude or replace any of the **days** identified in subsection 5(1)(a) if the following occurred: (i) the asset received **dispatch** for an amount greater than 0 MW; (ii) delivery was assessed in accordance with subsection 9(1); (iii) the load asset was subject to a **delayed forced outage** or **automatic**	

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		forced outage; (iv) the load asset was subject to a **planned outage**; or (v) the load asset was tripped for the provision of **load shed service**; (c) for each of the **days** identified in accordance with subsections 5(1)(a) excluding or replacing the **days** as indicated in subsection 5(1)(b), identify the **metered energy** for the **settlement interval** with the same **hour ending** as the delivery hour; and (d) calculate the average of the **metered energy** for the **settlement intervals** referred to in subsection 5(1)(c).	
5	**(2)**	The **ISO** must, for each delivery hour established in subsection 3(2), calculate an adjustment factor as follows: $adjustment\ factor = delivery\ consumption \div historical\ consumption_{3W}$ where: delivery consumption means the average consumption in MWh during the 3 hour window occurring 1 hour before the delivery hour; historical consumption means the average consumption in MWh during all of the 3W hours on the **days** identified in accordance with subsections 5(1)(a) and excluding or replacing the **days** as indicated in subsection 5(1)(b); and 3W means the 3 hour window occurring 1 hour before the same **hour ending** as the delivery hour.	
5	**(3)**	The **ISO** must establish the adjustment factor as: (a) 1.2 if the adjustment factor calculated in accordance with subsection 5(2) is greater than 1.2; (b) 0.8 if the adjustment factor calculated in accordance with subsection 5(2) is less than 0.8; or (c) the value calculated in accordance with subsection 5(2) in all other cases.	
5	**(4)**	The **ISO** must calculate the delivery baseline in MW as follows:	

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		delivery baseline = standard day baseline x adjustment factor where: the standard day baseline in MW is calculated in accordance with subsection 5(1); and the adjustment factor is the value established in accordance with subsection 5(3).	
		Asset-specific Penalty Rate for Availability Assessment	
6	**(1)**	The **ISO** must calculate the asset-specific penalty rate in $/MWh to be applied during the availability assessment, as follows: $$\textit{asset-specific penalty rate} = \frac{\text{capacity payment x 12}}{\text{capacity commitment x hours}}$$ where: capacity payment in $/month is calculated for the asset in accordance with Section 103.10 of the **ISO rules**, *Capacity Payment Calculation*; **capacity commitment** is in MW; and hours is the number of availability hours established in accordance with subsection 2(2).	
6	**(2)**	The **ISO** must establish the asset-specific penalty rate in $/MWh as: (a) $133/MWh, if the rate calculated in accordance with subsection 6(1) is less than $133/MWh and the clearing price of the **base auction** was greater than $33/kW-year; (b) $0/MWh, if the rate calculated in accordance with subsection 6(1) is less than $0/MWh and the clearing price of the **base auction** was less than or equal to $33/kW-year; or (c) the rate calculated in accordance with subsection 6(1) in all other cases.	
		Availability Assessment	

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7	**(1)**	The **ISO** must, as soon as practicable after an **obligation period**, identify the asset's availability volume in MWh during each of the availability hours identified in subsection 2 as follows: (a) for an asset with a **uniform capacity value** based on a capacity factor, availability volume is based on the sum of the following for each **settlement interval**, as applicable: (i) **metered energy**; (ii) in the case of an asset that was subject to a **dispatch** for **spinning reserve** or **supplemental reserve**, the volume that was provided according to Section 205.5 of the **ISO rules**, *Spinning Reserve Technical Requirements and Performance Standards* or Section 205.6 of the **ISO rules**, *Supplemental Reserve Technical Requirements and Performance Standards*; (iii) in the case of an asset that provides **regulating reserve**, the volume based on the **regulating reserve** provided pursuant to Section 205.4 of the **ISO rules**, *Regulating Reserve Technical Requirements and Performance Standards* that is not captured as **metered energy**; and (iv) in the case of an asset that was impacted by a **transmission market constraint**, the volume that was curtailed; (b) for an asset with a **uniform capacity value** based on **availability factor**, availability volume is equal to: (i) the **available capability** submitted into the Energy Trading System where the **offer** for electric energy was available for **dispatch** for that **settlement interval**; and (ii) if applicable, any **operating reserves** provided in that **settlement interval** pursuant to a **dispatch**; or (ii) 0 MW when there was no electric energy from the asset available for dispatch for that **settlement interval**; (c) for a load asset that provides a **guaranteed load reduction**, availability volume is the **available capability** for that **settlement interval**; (d) for a load asset that provides a **firm consumption level**, availability volume is	

Section	Subsection	Proposed language	Stakeholder comments
		based on the difference between the look-back baseline calculated in accordance with subsection 3 and the **firm consumption level** for that **settlement interval**; (e) for self-supply assets that are dispatched gross to grid, availability volume is based on the linear regression approach set out in Section 206.3 of the **ISO rules**, *Determination of Uniform Capacity Value*; and (f) for an import asset, availability volume is the **available capability** for that **settlement interval** capped at the volume of firm transmission established in accordance with Section 206.1 of the **ISO Rules**, *Qualification of Capacity.*	
7	**(2)**	The **ISO** must calculate the assessment volume in MWh for an asset as follows: *assessment volume* = $\sum$ availability volume – ***capacity commitment*** *x hours* where: availability volume in MWh is the value identified for each of the availability hours in accordance with subsection 7(1); and hours is the number of availability hours established in accordance with subsection 2(2).	
		Under-availability Adjustment	
8	**(1)**	The **ISO** must, when the assessment volume calculated in accordance with subsection 7(2) is negative, calculate the under-availability adjustment in dollars for an asset as follows: *under-availability adjustment = adjustment rate x assessment volume* where: adjustment rate in $/MWh is calculated in accordance with subsection 8(2); and assessment volume in MWh is calculated in accordance with subsection 7(2).	
8	**(2)**	The **ISO** must calculate the adjustment rate in $/MWh, for each asset, as follows: *adjustment rate = 40% x 1.3 x asset-specific penalty rate*	

Section	Subsection	Proposed language	Stakeholder comments
		where: asset-specific penalty rate in $/MWh is determined in accordance with subsection 6(2).	
8	**(3)**	The **ISO** must, for each asset, limit the under-availability adjustment amount for an **obligation period** to: (a) an amount in dollars equal to the annual cap determined in accordance with subsection 14(2) minus the sum of all under-delivery adjustments determined in accordance with subsection 12(3) for the **obligation period**, if the sum of the under-availability adjustment determined in accordance with subsection 8(1) and under-delivery adjustments for the **obligation period** is greater than the annual cap; or (b) the amount in dollars calculated in accordance with subsection 8(1), in all other cases.	
		Over-availability Adjustment	
9	**(1)**	The **ISO** must, when the assessment volume calculated in accordance with subsection 7(2) is positive, calculate the over-availability adjustment in dollars for an asset as follows: *over-availability adjustment = adjustment rate x assessment volume* where: adjustment rate is the value calculated in accordance with subsection 9(2); and assessment volume in MWh is calculated in accordance with subsection 7(2).	
9	**(2)**	The **ISO** must calculate the adjustment rate in $/MWh, which is the same value for all assets, as follows: $$adjustment\ rate = \frac{\sum under\text{-}availability\ adjustments}{\sum positive\ assessment\ volumes}$$ where: under-availability adjustments in dollars is determined in accordance with 8(3) for all assets subject to a **capacity commitment** in an **obligation period**; and positive assessment volumes in MWh is the positive values calculated in	

Section	Subsection	Proposed language	Stakeholder comments
		accordance with subsection 7(2) for all assets subject to a **capacity commitment** in an **obligation period**.	
9	**(3)**	The **ISO** must, for each asset, limit the over-availability adjustment amount for an **obligation period** to an amount in dollars equal to the annual cap determined in accordance with subsection 15 minus the sum of all over-delivery adjustments determined in accordance with subsection 13(3) for the **obligation period.**	
		Asset-specific Penalty Rate for Delivery Assessments	
10	**(1)**	The **ISO** must calculate the asset-specific penalty rate in $/MWh for an asset, to be applied during the delivery assessments, as follows: $$\textit{asset-specific penalty rate} = \frac{\text{capacity payment x 12}}{\text{capacity commitment x hours}}$$ where: capacity payment in $/month is calculated for the asset in accordance with Section 103.10 of the **ISO rules**, *Capacity Payment Calculation*; and hours is the greater of 20 or the forecasted number of energy supply shortfall hours for the **obligation period** as described in the *Capacity Market Auction Guidelines* published for the last **rebalancing auction** of the **obligation period**.	A similar approach for determining penality rate for delivery assessment is required to self-supply assets.
10	**(2)**	The **ISO** must establish the asset-specific penalty rate in $/MWh as: (a) $1,667/MWh, if the rate calculated in accordance with subsection 10(1) is less than $1,667/MWh and the clearing price of the **base auction** was greater than $33/kW-year; (b) $0/MWh, if the rate calculated in accordance with subsection 10(1) is less than $0/MWh and the clearing price of the **base auction** was less than or equal to $33/kW-year or (b) the rate calculated in accordance with subsection 10(1) in all other cases.	A similar approach for determining penality rate for delivery assessment is required to self-supply assets.
		Delivery Assessments	
11	**(1)**	The **ISO** must, as soon as practicable in the **settlement period** following each delivery hour established in subsection 3(2), identify an asset's delivery volume in MWh during	Delivery assessment should be defined for self supply assets which take capacity and

Section	Subsection	Proposed language	Stakeholder comments
		each of the delivery hours as follows: (a) for an asset with a **uniform capacity value** based on a **capacity factor** or **availability factor**, the delivery volume is based on the sum of the following for each **settlement interval**, as applicable: (i) **metered energy**; (ii) in the case of an asset that was subject to a **dispatch** for **spinning reserve** or **supplemental reserve**, the volume that was provided according to Section 205.5 of the **ISO rules**, *Spinning Reserve Technical Requirements and Performance Standards* or Section 205.6 of the **ISO rules**, *Supplemental Reserve Technical Requirements and Performance Standards*; and (iii) in the case of an asset that provided **regulating reserve**, the volume based on the **regulating reserve** provided pursuant to Section 205.4 of the **ISO rules**, *Regulating Reserve Technical Requirements and Performance Standards* that is not captured as **metered energy**; (b) for a load asset that provides a **guaranteed load reduction**, the delivery volume is equal to the delivery baseline calculated in accordance with subsection 5(4) minus the following for each **settlement interval**, as applicable: (i) **metered energy**; and (ii) in the case of an asset that provided **spinning reserve** or **supplemental reserve**, the volume that was dispatched. (c) for a load asset that provides a **firm consumption level**, the delivery volume is equal to the qualified baseline as calculated in accordance with Section 206.3 of the **ISO rules**, *Determination of Uniform Capacity Value* minus the following for each **settlement interval**, as applicable: (i) **metered energy**; and (ii) in the case of an asset that provided **spinning reserve** or **supplemental reserve**, the volume that was dispatched. (d) for self-supply configurations with excess generation, the delivery volume is based on **metered energy**; and	associated energy from the grid during assessment periods

Section	Subsection	Proposed language	Stakeholder comments
		(e) for an import asset, the delivery volume is: (i) the volume in a validated **e-tag**; or (ii) in the case of an import asset where the **offer** price is greater than or equal to $0.01 per MWh during the first two delivery hours that are subject to the limits referenced in Section 303.2 of the **ISO rules**, *Available Transfer Capability*, the volume in the **offer**.	
11	**(2)**	The **ISO** must adjust the delivery volumes identified in subsection 11(1) for each delivery hour to include any delivery volume adjustments due to any substitutions which was approved in accordance with Section 206.9 of the **ISO rules**, *Asset Substitution*, and as follows: (a) in the case of an asset that was impacted by a **transmission market constraint**, the volume that was curtailed will be added to the delivery volume identified in subsection 11(1); (b) in the case of a load asset that was armed for the provision of **load shed service**, the volume that was armed will be added to the delivery volume identified in subsection 11(1); or (c) in all other cases, no adjustments to the delivery volume identified in subsection 11(1).	
11	**(3)**	The **ISO** must calculate the assessment volume in MWh for an asset during each delivery hour established in subsection 3(2) as follows: *assessment volume = delivery volume – (capacity commitment volume x balancing ratio)* where: delivery volume in MWh is the value in identified in subsection 11(2); capacity commitment volume in MWh means the quantity of electric energy expected to be delivered from an asset based on its **capacity commitment** during the supply shortfall hour or portion thereof; and balancing ratio is the value calculated in subsection 11(5).	

Section	Subsection	Proposed language	Stakeholder comments
11	**(4)**	The **ISO** must establish the assessment volume in MWh for an asset for each delivery hour established in subsection 3(2) as follows: (a) for an asset with a **uniform capacity value** based on a **capacity factor** or **availability factor**, the assessment volume is calculated in accordance with subsection 11(3) and subject to any reallocation volumes which were approved in accordance with Section 206.10 of the **ISO rules**, *Volume Reallocation*; (b) for self-supply configurations with excess generation the assessment volume is calculated in accordance with subsection 11(3) and subject to any reallocation volumes which were approved in accordance with Section 206.10 of the **ISO rules**, *Volume Reallocation*; (c) for an import asset, the assessment volume is calculated in accordance with subsection 11(3) and subject to any reallocation volumes which were approved in accordance with Section 206.10 of the **ISO rules**, *Volume Reallocation*; or (d) for a load asset that provides a **guaranteed load reduction** or a **firm consumption level**: (i) if the delivery hour occurred on a **day** which the load asset was subject to a **delayed forced outage** or **automatic forced outage**, that is not the first day of that **delayed forced outage** or **automatic forced outage**, the assessment volume is 0 MWh; (ii) if the supply shortfall hour occurred on a **day** which the load asset was subject to a **planned outage**, the assessment volume is 0 MWh; or (iii) in all other cases, the assessment volume is calculated in accordance with subsection 11(3) and subject to any reallocation volumes which were approved in accordance with Section 206.10 of the **ISO rules**, *Volume Reallocation*.	
11	**(5)**	The **ISO** must calculate for each delivery hour established in subsection 3(2), the balancing ratio as follows: $$balancing\ ratio = min\{\frac{\sum delivery\ volumes}{\sum capacity\ commitment\ volumes}, 1\}$$	

Section	Subsection	Proposed language	Stakeholder comments
		where: delivery volumes in MWh is the values identified in subsection 11(2) for all assets subject to a **capacity commitment** in an **obligation period**; and capacity commitment volumes in MWh means, for each asset subject to a **capacity commitment** in an **obligation period**, the quantity of electric energy expected to be delivered from an asset based on its **capacity commitment** during the supply shortfall hour or portion thereof.	
		Under-delivery Adjustment	
12	**(1)**	The **ISO** must, when the assessment value determined in accordance with subsection 11(4) is negative, calculate the under-delivery adjustment in dollars for an asset as follows: *under-delivery adjustment = adjustment rate x assessment volume* where: adjustment rate in $/MWh is calculated in accordance with subsection 12(2); and assessment volume in MWh is the value determined in accordance with subsection 11(4).	
12	**(2)**	The **ISO** must calculate the adjustment rate in $/MWh as follows: *adjustment rate = 60% x 1.3 x asset-specific penalty rate* where asset-specific penalty rate in $/MWh is determined in accordance with subsection 10(2).	
12	**(3)**	The **ISO** must, for each asset, cap the under-delivery adjustment amount for each **settlement period** to the lesser of: (a) the monthly cap determined in accordance with subsection 14(1); or (b) an amount equal to the annual cap determined in accordance with subsection 14(2) minus the sum of all under-delivery adjustments calculated in accordance with this subsection 12(3) for the prior **settlement periods** of the **obligation period**.	

Section	Subsection	Proposed language	Stakeholder comments
		Over-delivery Adjustment	
13	**(1)**	The **ISO** must, when the assessment value determined in accordance with subsection 11(4) is positive, calculate the over-delivery adjustment in dollars for an asset as follows: *over-delivery adjustment = adjustment rate x assessment volume* where: adjustment rate in $/MWh is calculated in accordance with subsection 13(2); and assessment volume in MWh is the value determined in accordance with subsection 11(4).	
13	**(2)**	The **ISO** must calculate the adjustment rate in $/MWh as follows: $adjustment\ rate = \frac{\sum under-delivery\ adjustments}{\sum positive\ assessment\ volumes}$ where: under-delivery adjustments in dollars is determined in accordance with 12(3) for all assets subject to a **capacity commitment** in an **obligation period**; and positive assessment volumes in MWh are the positive values calculated in accordance with subsection 11(4) for all assets subject to a **capacity commitment** in an **obligation period**.	
13	**(3)**	The **ISO** must, for each asset, limit the over-delivery adjustment amount in dollars for a **settlement period** to an amount equal to the annual cap determined in accordance with subsection 15 minus the sum of all over-delivery adjustments determined in accordance with this subsection 13(3) for the prior **settlement periods** of the **obligation period.**	
		Maximum Payment Adjustments for Under-availability and Under-delivery	
14	**(1)**	The **ISO** must cap for each asset, any under-delivery adjustment for a **settlement period** at an amount in dollars equal to: (a) *monthly cap = capacity payment x 3* where capacity payment in $/month is the asset's monthly capacity payment calculated in accordance with Section 103.10 of the **ISO rules**, *Capacity*	

Section	Subsection	Proposed language	Stakeholder comments
		Payment Calculation; or (b) *monthly cap = default rate x* ***capacity commitment*** *x max{supply shortfall hours, 20}* where the default rate is $417/MW.	
14	**(2)**	The **ISO** must cap for each asset, the sum of any under-availability adjustment and under-delivery adjustments for each **obligation period** at an amount in dollars equal to the greater of: (a) *annual cap = capacity payment x 12 x 1.3* where capacity payment in $/month is the asset's monthly capacity payment calculated in accordance with Section 103.10 of the **ISO rules**, *Capacity Payment Calculation*; or (b) *annual cap = default rate x* ***capacity commitment*** where the default rate is $33,333/MW.	
		Maximum Payment Adjustments for Over-availability and Over-delivery	
15		The **ISO** must cap for each asset, the sum of any over-availability adjustment and over-delivery adjustments for an **obligation period** at an amount in dollars equal to the greater of: (a) *annual cap = capacity payment x 12* where capacity payment means the assets monthly capacity payment in dollars determined in accordance with Section 103.10 of the **ISO rules**, *Capacity Payment Calculation*; or (b) *annual cap = default rate x* ***capacity commitment*** where the default rate is $33,333/MW.	

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

Item #		Stakeholder comments
1	whether you agree that the proposed new ISO Rule – Section 206.8, *Obligation Period Performance Assessments* relates to the capacity market and why or why not	
2	whether you agree that the proposed new ISO Rule – Section 206.8, *Obligation Period Performance Assessments* should [or should not] be in effect for a fixed term and why or why not	
3	whether you understand and agree with the objective or purpose of the proposed new ISO Rule – Section 206.8, *Obligation Period Performance Assessments* and whether, in your view, the proposed new ISO Rule – Section 206.8, *Obligation Period Performance Assessments* meets the objective or purpose	
4	how, in your view, the proposed new ISO Rule – Section 206.8, *Obligation Period Performance Assessments* affects the performance of the capacity market and the electricity market	
5	your views on any analysis conducted or commissioned by the AESO supporting the proposed new ISO Rule – Section 206.8, *Obligation Period Performance Assessments*	
6	whether you agree with the proposed new ISO Rule – Section 206.8, *Obligation Period Performance Assessments* taken together with all ISO rules and in light of the principle of a fair, efficient and openly competitive market	

Item #		Stakeholder comments
7	whether you would suggest any alternatives to the proposed new ISO Rule – Section 206.8, *Obligation Period Performance Assessments*	Penalties need to be introduced for self suppliers that use capacity but do not pay for it. The penalties need to be punitive in nature because of the system risk. In addition, punitive penalties will not affect risk exposure of market participant therefore will not affect clearing pricing.
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	
9	whether you agree that the proposed provisional rule supports the public interest and why or why not	

Please provide your views on the type of content that should be included in an information document associated with the proposed new ISO Rule – Section 206.8, Obligation Period Performance Assessments.
