

<p>Period of Comment: February 25, 2021 through March 18, 2021</p> <p>Comments From: Capital Power</p> <p>Date: 2021/03/18</p>	<p>Contact: Matthew Davis</p> <p>Phone: 403.540.6087</p> <p>Email: mdavis@capitalpower.com</p>
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Instructions:

1. Please fill out the section above as indicated.
2. Please respond to the questions below and provide your specific comments (if any). Blank boxes will be interpreted as favourable comments.

The AESO is seeking comments from Stakeholders on proposed amendments to the Financial Settlement Rules 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 in the letter of notice requires the proposed amendments to the Financial Settlement Rules? Please comment.	<p>While Capital Power is generally supportive of removing unnecessary or duplicative requirements and reducing overall administrative burden, the AESO’s proposed changes appear focused on on reducing its own obligations, many of which market participants rely on.</p> <p>While the financial settlement rules may be aligned with business processes and practices, having such processes articulated in the rules provide the stability and certainty that market participants expect.</p>
2.	Do you agree or disagree with the potential purpose of the proposed amendments to the Financial Settlement Rules? Please comment.	<p>The AESO’s purpose is appears to highlight three primary objectives.</p> <p>First, Capital Power appreciates that over-time drafting styles will evolve and typographical errors will be uncovered. By addressing these minor amendments only when reviewing a rule provides efficiencies which are appreciated.</p> <p>Secondly, Capital Power would note that substantive changes are mixed between red tape reduction and introducing new aspects of the rule. Capital Power would note that additional detail would be beneficial to better understand the AESO’s intent with these changes, particularly for amendments highlighted in section 3 below.</p> <p>Finally, Capital Power would note that the AESO’s reduction in regulatory requirements appears focused on their own obligations and does not appear to meaningfully reduce red-tape on market participants.</p>

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3.	Do you agree or disagree with the proposed consultation and timelines? Please comment.	Capital Power believes that written consultation will suffice for the specific purpose of revisions to the financial settlement rules.
4.	Do you agree or disagree with the proposed amendments to the Financial Settlement Rules? Please comment.	<p>Capital Power has the following comments on the specific rule amendments below:</p> <p><u>Proposed changes to Rule 103.4 Power Pool Financial Settlement</u></p> <p>Capital Power is supportive of the following amendments:</p> <ul style="list-style-type: none"> • Revisions enabling payment by way of electronic funds transfers (EFT) is a welcome improvement to the AESO’s processes. <p>Capital Power disagrees with the subsequent amendments and suggests the following:</p> <ul style="list-style-type: none"> • Capital Power is concerned that removing references to producing the preliminary power pool statement (subsections 13(1-4), 16, 17, 18) could lead to potentially allowing for erroneous reporting, and modifying or removing the statement without consultation. These are used for vetting settlement and addressing any issues quickly. If preliminary statements were to be materially modified, or ceased, market participant’s validation efforts would be negatively impacted and would limit the possibility of challenging any discrepancies and errors. • The AESO in introducing interest provisions relating to errors in metering data has added new content to the rule. Capital Power is of the opinion that the AESO should consult further on this as errors in metering data may be out of the control of the pool participant (<i>i.e.</i> the result of a Meter Data Manager error) and it would be beneficial to understand the driver for what the AESO is aiming for with this addition to the rule. • Capital Power suggests that under the proposed section 18 (7) addition, the wording should be reflective of the AESO only having the right to withhold an amount equal to unpaid/disputed amounts, rather than withhold entire payments to participants. Theoretically, as it stands currently, situations could arise that would pose liquidity issues for participants. <p>Capital Power would appreciate clarification on the following amendments:</p> <ul style="list-style-type: none"> • Removal of section 17 – Metering Data Submission Requirements. Removal of this section would only increase the administrative burden associated with

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		<p>metered data, unless the AESO looks to subsection 9.6.2.4.1 of Commission Rule 021. Capital Power believes that these terms should be clearly stated in 103.4 to avoid any confusion, and to ensure meter data managers are following requirements.</p> <p><u>Proposed revisions to Rule 103.6 ISO Fees and Charges</u></p> <p>Capital Power is supportive of the following amendments:</p> <ul style="list-style-type: none"> • Capital Power has no concerns with the AESO's process changes for records requests. <p>Capital Power disagrees with the following amendments:</p> <ul style="list-style-type: none"> • Removing AESO requirements to publish as schedule of fees & pool participant fees is concerning. Maintaining these requirements in the ISO rules provide certainty to market participants that these will be kept up-to-date and accurate and removal may negatively affect commercial agreements.
5.	Do you have any additional comments?	Capital Power does not have any further comments at this time.