

Stakeholder Comment Matrix

Development of Proposed Amended ISO Rules and AESO Consolidated Authoritative Documents Glossary Definitions, collectively referred to as the “TCM Updates”



Period of Comment: February 6, 2020 through February 21, 2020	Contact: Colin Robb
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Date: 2020/02/21	Email: cmrobb@capitalpower.com

Instructions:

1. Please fill out the section above as indicated.
2. Please refer back to the Consultation Letter under the “Attachments” section to view materials related to the proposed TCM Updates.
3. 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 the development of the proposed TCM Updates with regard to the following matters:

Stakeholder Comment Matrix

Development of Proposed Amended ISO Rules and AESO Consolidated Authoritative Documents Glossary Definitions, collectively referred to as the “TCM Updates”



	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 TCM Updates? Please comment.	<p>As noted in previous submissions, Capital Power is concerned with the proposed changes to the requirements for transmission constraint management. Capital Power submits that additional consultation with market participants is necessary to address outstanding items. Specifically, there is a need for communication requirements for transmission facility operators to notify market participants of outages that may impact generators.</p> <p>With the revised definition of Acceptable Operational Reason, there is currently no effective mechanism for communication of these outages which could lead to challenges for market participants fulfilling the requirements for available capability restatements.</p>
2.	Do you agree or disagree with the potential objective or purpose of proposed TCM Updates? Please comment.	Capital Power has no comment on the potential objective or purpose of the proposed updates.
3.	Do you agree or disagree with the proposed form of consultation and timelines? Please comment.	Capital Power submits that the consultation plan, as outlined in the AESO notice, may not be the most appropriate approach to deal with the concern noted above. The AESO should convene a technical session with interested parties to assess whether there is a solution that could be implemented with transmission facility operators that would notify transmission-connected generators of outages that would require restatements of available capability. Capital Power submits that this should be addressed outside of the proceeding and in advance of the application to the Alberta Utilities Commission.
4.	Do you intend to participate in any related consultation? OR Do you agree that no consultation group is required for this rule development? Please comment.	Capital Power will participate in consultations relating to the TCM Updates.
5.	Do you have any additional comments?	Capital Power has no additional comments.