

Stakeholder Comment Matrix – December 4, 2018



Development of a Proposed New ISO rule Waivers and Variances Rule

<p>Period of Comment: December 4, 2018 through December 19, 2018</p> <p>Comments From: Capital Power Corporation</p> <p>Date [yyyy/mm/dd]: 2018/12/19</p>	<p>Contact: Colin Robb</p> <p>Phone: 780.392.5169</p> <p>Email: cmrobb@capitalpower.com</p>
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The AESO is seeking comments from Stakeholders on the development of proposed new ISO rule Waivers and Variances Rule 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 new ISO rule Waivers and Variances Rule? Please comment.	The AESO indicates that it has recently received a number of requests for waivers and variances that it was unable to consider, despite its assessment that the requests may be appropriate based on technical merits. Capital Power supports a process to review potential amendments to Division 502 ISO Rules that would grant the AESO the authority to review and grant material variances on technical requirements for all Alberta generating units prior to and post-energization.
2.	Do you agree or disagree with the potential objective or purpose of proposed new ISO rule Waivers and Variances Rule Please comment.	Capital Power supports the AESO's objectives identified in the December 4, 2018 Notice regarding proposed new ISO rules for waivers and variances. In developing a solution to resolve the current challenges, Capital Power submits that the solution should be applied consistently and fairly across all market participants.
3.	Do you agree or disagree with the proposed form of consultation and timelines? Please comment.	The AESO proposes to host an in-person working group session in January 2019, followed by additional consultation steps, which may include workgroup sessions, webinars, or written feedback. The AESO is targeting Q1 2019 for completion of all consultation. Capital Power supports the proposed consultation and timeline, and submits that the AESO should move expeditiously at the conclusion of consultation to finalize amended ISO rules for submission to the Commission. Delays in this process

		create unnecessary regulatory uncertainty and compliance risks for market participants.
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 any related consultation on this matter, and at a minimum, expects the opportunity to review and provide written comments on draft rule amendments.
5.	Do you have any additional comments?	Capital Power has no additional comments at this time.