

Proposed New Definition “Obligation Period”

Period of Comment: January 3, 2019 through January 18, 2019	Contact: Jay Dyson
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Please include any suggestions for alternative definition wording and accompanying rationale in the table below. Track in your changes to the existing definition wording in column one below.

Blackline of Suggested Rule Wording	Rationale
<p>“obligation period” means a 12-month period running continuously from November 1 to October 31 of the following year.</p>	

Please provide any comments you have on other Capacity Market Definitions arising from the two documents referenced in the Letter of Notice. Include a description how the two documents relate to these other Capacity Market Definition.

ENMAX reiterates in comments in previous matrix responses supporting a 12-month obligation period definition for all resource types, including new entrants and incumbent resources. It is imperative that the obligation period be consistent between resource classes, maintaining a level playing field for all resources and maintaining investor confidence in the market. The capacity market should be technology and vintage neutral, and should not arbitrarily favour one resource over the other. Performance will be determined through the incentive/penalty structure, not vintage. Moreover, the Alberta market is small, and treating new and existing in different manners would have the effect of bifurcating the market and creating deferential price signals, essentially favouring one resource type (new), over other resources (existing), regardless of performance or contribution to reliability.