

DRAFT Capacity Resource Prequalification Process Review and Comments

Date: March 8, 2018

Organization: ENMAX

RE: Feedback – Capacity Resource Pregualification Process and Requirements

ENMAX appreciates the opportunity to provide feedback to the AESO on the draft prequalification requirements for Alberta capacity resources. We offer the following preliminary response, however, request that the AESO table a revised pre-qualification document for discussion at the upcoming Design Working Group (DWG) meeting. The process and requirements defined in AESO's draft are a significant key design element of the capacity market and need to be discussed by the working group in greater detail.

Defined Terms

Throughout the document there are many Defined Terms that have not been defined by the AESO. For ENMAX to provide a sufficient evaluation of the draft, we need to understand what these key terms reference. We request that the subsequent draft provide the appropriate glossary to define these terms. Without clarification of these items, ENMAX is left to speculate on their meaning and cannot effectively evaluate the information provided.

Project Delivery Experience

ENMAX fails to see the rationale for the stringent experience requirements defined by the AESO. As a significant market participant and developer of many of the key generation facilities permitted and commissioned over the past 10 years, ENMAX may still have difficulty meeting the pre-qualification criteria for certain types of projects. A rationale for the creation of this significant barrier to entry for new and incumbent developers has not been provided by the AESO and ENMAX fails to see its value or need.

ENMAX continues to support the AESO's transparent engagement process and welcomes further discussions of this concept at the working group level.