Comprehensive Market Design Stakeholder Comment Matrix
Technical Working Group – *FINAL*

Please complete this matrix by February 27, 2018, and upload it to the "Feedback" folder on the CMD SharePoint site. The AESO will post all comment matrices received from working group members on www.aeso.ca. **Please note that the names of the parties submitting each completed comment matrix will be included in this posting.** The AESO does not intend to respond to individual submissions. If you have any questions about this comment matrix, please email capacitymarket@aeso.ca

Name: Jay Dyson Organization: ENMAX

Date: February 27, 2017

CMD Key Design Questions	Comments and / or Recommendations
1. UCAP: Can you support the availability factor/capacity factor over the 100 hours of smallest supply cushion being used to calculate the UCAP?	ENMAX can support the usage of the 100 hours of smallest supply cushion being used to calculate UCAP. However, we believe that hours where a resource is on a planned outage should be excluded from the 100 tightest hour calculation.
2. UCAP: Can you support the UCAP calculation being based on 5 years of historical data?	ENMAX can support the calculation of UCAP being based on 5 years of historical data. However, we would like the AESO to incorporate a process where generators are permitted to challenge or dispute UCAP calculations as plant owners are best positioned to evaluate their available capacity.
3. UCAP: Are there risks with including planned outages in the availability factor data used to calculate UCAP? If so please describe.	ENMAX believes there are significant issues with planned outages being included in a resource UCAP calculation. The exclusion of planned outages from the UCAP calculation underestimates the available capacity on the system which can lead to over-procurement and greater costs to consumers. Furthermore, the AESO has proposed penalties for resources on planned outages during performance hours, therefore, including planned outages within the UCAP calculation double penalizes generators. Together, these provide a disincentive to undertake appropriate planned maintenance which is required for system reliability.
4. Demand Curve: Do you have any feedback on the material presented in the CMD 1? Note: AESO and the WG will revisit the shape of the demand curve once draft outputs from the Resource Adequacy model are available.	Further explanation is required for the reason of right-handed shift of the demand curve above the target reliability requirement. Specifically, the reasons as to why the inflection point in the demand curve is above the reliability target. This right-shift of the demand curve might result in over-procurement concerns. ENMAX requests visibility of the data used to generate the demand curve and believes that there should be an ongoing transparent process to determine the demand curve parameters as part of the market operation.
5. Load Forecast: Can you support the proposed approach to forecast load? Are there any outstanding comments or concerns with the proposed approach?	ENMAX believes there should be a transparent stakeholder process in determining the load forecast. We request that additional clarity on load modeling and post-modeling adjustments be provided.
6. CONE: Can you support the intended Gross CONE estimation approach?	ENMAX is of the view that there needs to be a transparent stakeholder process in determining gross-CONE. ENMAX is concerned about 0.5 x gross-CONE selection as this is not aligned with any capacity market in other jurisdictions and we are concerned that a 0.5 multiplier of gross-CONE is too low in cases of low net-CONE or administrative error of net-CONE calculation. This part of the cap should provide a backstop in the case of a very low net-CONE.

CMD Key Design Questions	Comments and / or Recommendations
7. CONE: What are the important considerations AESO needs to take into account when selecting the Energy and Ancillary Service offset estimation methodology?	ENMAX is of the view that there needs to be a robust stakeholder process to determine the appropriate modeling of energy and ancillary services.
8. CONE: Are there any issues or gaps in our considerations or plan in Net CONE estimation?	The principle gap is that there has not been enough background information provided to identify if there are issues or gaps in net-CONE determination or demand parameters. ENMAX believes the AESO should provide the pro-forma financial model developed to determine CONE to stakeholders as well as the data used to generate the demand curve parameters.

General Comments: Any comments on relevant scope areas of the CMD that are not addressed above