

## Stakeholder Comment Matrix – September 7, 2018

Proposed Amended ISO rules: Section 201.1, *Pool participant Registration*;  
 Section 204.2, *Issuing Dispatches for Dispatch Down Service*  
 Section 302.1, *Real Time Transmission Constraint Management*  
 Section 306.3, *Load Planned Outage Reporting*  
 Section 306.4, *Transmission Outage Reporting and Coordination*  
 Section 505.2, *Performance Criteria for Refund of Generating Unit Owner's Contribution*



<b>Period of Comment:</b>	September 7, 2018	through	September 28, 2018	<b>Contact:</b>	Travis Robinson
<b>Comments From:</b>	EPCOR Distribution & Transmission Inc.			<b>Phone:</b>	780-412-3079
<b>Date [yyyy/mm/dd]:</b>	2018/10/01			<b>Email:</b>	trobinson@epcor.com

**Please provide comments relating to the subsection of the proposed rule in the corresponding box. Please include any views on whether the language clearly articulates the requirement for either the AESO or a market participant, and provide any proposed alternative wording.**

Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
<p>The AESO is seeking comments from Stakeholders on the development of the following proposed amended ISO rules:</p> <ul style="list-style-type: none"> <li>i. <b>Section 305.4 System Security</b></li> <li>ii. <b>Section 501.10 Transmission Loss Factors</b></li> <li>iii. <b>Section 502.9 Synchrophasor Measurement Unit Technical Requirements</b></li> <li>iv. <b>Section 507.1 Open Access Requirement for Proposed Interties</b></li> </ul> <p>with regard to the following matters:</p>	
<p>1. Do you agree or disagree with the proposed amended ISO rules:                  Section 201.1, <i>Pool participant Registration</i>;                  Section 204.2, <i>Issuing Dispatches for Dispatch Down Service</i>;                  Section 302.1, <i>Real Time Transmission Constraint Management</i>;                  Section 306.3, <i>Load Planned Outage Reporting</i>;                  Section 306.4, <i>Transmission Outage Reporting and Coordination</i>; and</p>	<p>EPCOR Distribution &amp; Transmission Inc. (EDTI) opposes the changes to ISO Rule Section 306.4. The proposed change to the outage scheduling requirements in this rule from a 24 month planning horizon to a 48 month planning horizon is a significant change that impacts entities beyond those interested in the capacity market, particularly owners</p>

Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
<p>Section 505.2, <i>Performance Criteria for Refund of Generating Unit Owner's Contribution?</i> If you disagree, please provide comments.</p>	<p>and operators of transmission facilities. Planning work that requires outages 24 months in advance is in itself challenging and resource intensive. Planning work 48 months in advance will be even more challenging, less accurate and require more scheduling updates. In both the existing and proposed ISO Rule Section 306.4 the AESO reviews and approves outages the week the outage is scheduled to occur. If the intent of this proposed change to the rule is to allow more information to be available to those interested in bidding in the capacity market, EDTI recommends that the AESO review requested outages further in advance of the outages occurring rather than requiring owners of transmission facilities to attempt to plan their work that requires outages four years in advance.</p>
<p>2. Are there any subsections where the language does not clearly articulate the requirement for either the AESO or a market participant? If yes, please indicate the subsections and suggest language that would improve the clarity.</p>	
<p>3. Do you have any additional comments?</p>	

**Please provide your comments on the following (as set out in AUC Rule 017 s. 13(b-j)):**

Item #		Stakeholder comments
1	<p>whether you agree that amended ISO rules:</p> <p>Section 201.1, <i>Pool participant Registration</i>;            Section 204.2, <i>Issuing Dispatches for Dispatch Down Service</i>;            Section 302.1, <i>Real Time Transmission Constraint Management</i>;            Section 306.3, <i>Load Planned Outage Reporting</i>;            Section 306.4, <i>Transmission Outage Reporting and Coordination</i>; and            Section 505.2, <i>Performance Criteria for Refund of Generating Unit Owner's Contribution</i></p> <p>relates to the capacity market and why or why not</p>	
2	<p>whether you agree that amended ISO rules:</p> <p>Section 201.1, <i>Pool participant Registration</i>;            Section 204.2, <i>Issuing Dispatches for Dispatch Down Service</i>;            Section 302.1, <i>Real Time Transmission Constraint Management</i>;            Section 306.3, <i>Load Planned Outage Reporting</i>;            Section 306.4, <i>Transmission Outage Reporting and Coordination</i>; and            Section 505.2, <i>Performance Criteria for Refund of Generating Unit Owner's Contribution</i></p> <p>should [or should not] be in effect for a fixed term and why or why not</p>	

Item #		Stakeholder comments
3	<p>whether you understand and agree with the objective or purpose of amended ISO rules:</p> <p>Section 201.1, <i>Pool participant Registration</i>;            Section 204.2, <i>Issuing Dispatches for Dispatch Down Service</i>;            Section 302.1, <i>Real Time Transmission Constraint Management</i>;            Section 306.3, <i>Load Planned Outage Reporting</i>;            Section 306.4, <i>Transmission Outage Reporting and Coordination</i>; and            Section 505.2, <i>Performance Criteria for Refund of Generating Unit Owner's Contribution</i></p> <p>and whether, in your view, these amended ISO rules meets the objective or purpose</p>	<p>If the intent of the proposed change to the ISO Rule Section 306.4, lengthening the transmission outage planning horizon from 24 months to 48 months, is to allow more information to be available to those interested in bidding in the capacity market, EDTI disagrees that the changes meet that objective. According to the rule, the AESO will still review and approve all outages the week that they are scheduled to occur. To provide more reliable information to those interested in bidding in the capacity market, EDTI recommends that the AESO review requested outages further in advance of the outages rather than requiring owners of transmission facilities to attempt to plan their work that requires outages four years in advance.</p>
4	<p>how, in your view, amended ISO rules:</p> <p>Section 201.1, <i>Pool participant Registration</i>;            Section 204.2, <i>Issuing Dispatches for Dispatch Down Service</i>;            Section 302.1, <i>Real Time Transmission Constraint Management</i>;            Section 306.3, <i>Load Planned Outage Reporting</i>;            Section 306.4, <i>Transmission Outage Reporting and Coordination</i>; and            Section 505.2, <i>Performance Criteria for Refund of Generating Unit Owner's Contribution</i></p> <p>affects the performance of the capacity market and the electricity market</p>	

Item #		Stakeholder comments
5	<p>your views on any analysis conducted or commissioned by the AESO supporting amended ISO rules:</p> <p>Section 201.1, <i>Pool participant Registration</i>;            Section 204.2, <i>Issuing Dispatches for Dispatch Down Service</i>;            Section 302.1, <i>Real Time Transmission Constraint Management</i>;            Section 306.3, <i>Load Planned Outage Reporting</i>;            Section 306.4, <i>Transmission Outage Reporting and Coordination</i>; and            Section 505.2, Performance Criteria for Refund of Generating Unit Owner's Contribution</p>	
6	<p>whether you agree with amended ISO rules:</p> <p>Section 201.1, <i>Pool participant Registration</i>;            Section 204.2, <i>Issuing Dispatches for Dispatch Down Service</i>;            Section 302.1, <i>Real Time Transmission Constraint Management</i>;            Section 306.3, <i>Load Planned Outage Reporting</i>;            Section 306.4, <i>Transmission Outage Reporting and Coordination</i>; and            Section 505.2, Performance Criteria for Refund of Generating Unit Owner's Contribution</p> <p>taken together with all ISO rules and in light of the principle of a fair, efficient and openly competitive market</p>	

Item #		Stakeholder comments
7	<p>whether you would suggest any alternatives to amended ISO rules:</p> <p><i>Section 201.1, Pool participant Registration;</i>  <i>Section 204.2, Issuing Dispatches for Dispatch Down Service;</i>  <i>Section 302.1, Real Time Transmission Constraint Management;</i>  <i>Section 306.3, Load Planned Outage Reporting;</i>  <i>Section 306.4, Transmission Outage Reporting and Coordination; and</i>  <i>Section 505.2, Performance Criteria for Refund of Generating Unit Owner's Contribution</i></p>	
8	<p>whether you agree that the proposed provisional rule supports ensuring a reliable supply of electricity at a reasonable cost to customers and why or why not</p>	
9	<p>whether you agree that the proposed provisional rule supports the public interest and why or why not</p>	

***Please provide your views on the type of content that should be included in information documents associated with amended ISO rules – Section 201.1, Pool participant Registration, Section 204.2, Issuing Dispatches for Dispatch Down Service, Section 302.1, Real Time Transmission Constraint Management, Section 306.3, Load Planned Outage Reporting, Section 306.4, Transmission Outage Reporting and Coordination, and Section 505.2, Performance Criteria for Refund of Generating Unit Owner's Contribution.***