

Proposed New ISO rule – Section 206.1 – Qualification of Capacity

Period of Comment:	August 13, 2018	through	August 31, 2018	Contact:	Sarah Griffiths
Comments From:	EnerNOC			Phone:	416-697-3744
Date [2018/08/30]:				Email:	Sarah.griffiths@enernoc.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 by blacklining the proposed language below.

Section	Subsection	Proposed language	Stakeholder comments
		Applicability	
1		Section 206.1 applies to: <ul style="list-style-type: none"> (a) a person seeking to have the ISO qualify new capacity for the capacity market; (b) a capacity market participant seeking to have the ISO qualify refurbished capacity or incremental capacity for the capacity market; and (c) the ISO. 	
		Requirements	
		Application for Qualification of Capacity	
2	(1)	Each person or capacity market participant must, within the timelines prescribed by the <i>Capacity Market Auction Guidelines</i> , provide the ISO with a completed application including:	

Section	Subsection	Proposed language	Stakeholder comments
		<ul style="list-style-type: none"> (a) all information or documents that the ISO specifies; and (b) any applicable application fee as set out in the <i>Schedule of ISO Fees</i>. 	
2	(2)	The ISO may request additional clarification or information regarding the application or supporting documents from each person or capacity market participant .	
		Declarations for Incremental Capacity and Refurbished Capacity	
3	(1)	<p>A capacity market participant must, if it has applied to provide proposed incremental capacity within the timelines prescribed by the <i>Capacity Market Auction Guidelines</i>, submit to the ISO a declaration, in the manner specified by the ISO, as to whether the anticipated maximum capability of the asset with proposed incremental capacity will be either:</p> <ul style="list-style-type: none"> (a) the maximum capability of the asset had the capacity market participant not applied for proposed incremental capacity; or (b) remain as the anticipated maximum capability accounting for the proposed incremental capacity, <p>in the event that a capacity market participant fails to receive a capacity commitment for such asset in the base auction or rebalancing auction for some or all of the proposed incremental capacity.</p>	
3	(2)	<p>A capacity market participant must, within the timelines prescribed by the <i>Capacity Market Auction Guidelines</i> and in the manner specified by the ISO, submit to the ISO a declaration, as to whether an asset with refurbished capacity will:</p> <ul style="list-style-type: none"> (a) permanently delist in accordance with Section 206.X of the ISO rules, 	

Section	Subsection	Proposed language	Stakeholder comments
		<p><i>Delisting</i>; or</p> <p>(b) continue to participate in the energy market and capacity market, in the event that a capacity market participant fails to receive a capacity commitment for such asset in the base auction or rebalancing auction.</p>	
		<p>Qualification of New Capacity, Incremental Capacity and Refurbished Capacity</p>	
4	(1)	<p>The ISO must, based on the information in the application and any supporting documents provided pursuant to subsection 2, be satisfied that the asset:</p> <ul style="list-style-type: none"> (a) will be capable of providing energy to or reducing consumption from the interconnected electric system; (b) has a uniform capacity value greater than or equal to 1 MW; (c) will be developed, energized and commissioned in accordance with a project plan and timeline that aligns with the project milestones established by the ISO; (d) is not a source asset that is the subject of a renewable electricity support agreement in connection with rounds 1, 2 or 3 of the Renewable Electricity Program; (e) is not energy efficiency; (f) in the case of a load asset: <ul style="list-style-type: none"> (i) can or will be able to reduce demand during the obligation period in a way that is measureable by the ISO; (ii) is or will be a retail or self-retail asset; and (iii) is not located on a site with an onsite generating unit or aggregated generating facility that is participating in the capacity market. (g) in the case of an energy storage facility, is or will be capable of maintaining energy production at it uniform capacity value for a minimum of 4 hours; (h) in the case of an import asset: 	<p>Section 4(1)(f)(iii) – Clarification should be made that if a generating unit or aggregating generating unit is metered separately, participation by each individually metered asset/resource is allowed. This should also include load assets participating in demand response, which may have additional separately-metered asset(s) on site.</p> <p>Section 4(1)(f)(iii) – Clarification should be made that this does not include back up generation used for load curtailment purposes, which may not be metered separately but does not inject power to the grid and is part of a demand response portfolio.</p> <p>4(1) (j) As noted in the consultations, additional demand response MWs will not be treated as ‘incremental capacity’, but as ‘new capacity’. Will there be a rule that allows ‘new capacity’ to be added to ‘capacity’, and to participate as one resource (similar to the addition of incremental capacity to capacity)? If so, where will it be included?</p>

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		<ul style="list-style-type: none"> (i) has firm transmission from the import asset to the Alberta border for the duration of the obligation period; (ii) is not participating as non-recallable capacity in a resource adequacy program of another jurisdiction; and (iii) will be curtailed on a pro-rata basis by the balancing authority of the jurisdiction in which the import asset is located in when load, which is firm, is curtailed. <ul style="list-style-type: none"> (i) in the case of an aggregation of assets: <ul style="list-style-type: none"> (i) has a uniform capacity value less than or equal to the uniform capacity value of the largest generating unit in Alberta; (ii) has or will have the appropriate metering the ISO specifies for each asset in the aggregation; (iii) is comprised of assets that are either exclusively load assets or exclusively generating units or aggregated generating facilities; and (iv) is not comprised of any asset that will contribute capacity individually, or as part of another aggregation, to the capacity market; (j) in the case of incremental capacity, will be retrofitted in a manner that will, in the opinion of the ISO, increase the maximum capability of the asset by an amount in MW that is: <ul style="list-style-type: none"> (i) greater than or equal to 1 MW; and (ii) less than or equal to the greater of: <ul style="list-style-type: none"> (A) 15% of the asset's maximum capability; or (B) 40 MW above the asset's maximum capability. (k) in the case of refurbished capacity, will be retrofitted in a manner that will, in the opinion of the ISO, result in either: <ul style="list-style-type: none"> (i) an increase in the asset's maximum capability by an amount exceeding the greater of: <ul style="list-style-type: none"> (A) 15% of the asset's maximum capability; or 	

Section	Subsection	Proposed language	Stakeholder comments
		<p>(B) 40 MW above the asset's maximum capability; or</p> <p>(ii) a capital investment of greater than or equal to \$200 per kW of the asset's maximum capability multiplied by a capital cost escalation rate that is specified by the ISO.</p>	
4	(2)	<p>The ISO may, in a determination made pursuant to subsection 4(1)(k)(ii), reject any cost information submitted by the capacity market participant if the ISO determines that such costs are unreasonable.</p>	
4	(3)	<p>The ISO must qualify an asset with new capacity, refurbished capacity or incremental capacity for the capacity market if:</p> <p>(a) the application provided pursuant to subsection 2 is complete; and</p> <p>(b) the ISO is satisfied pursuant to subsection 4(1), as applicable.</p>	
4	(4)	<p>The ISO must, within the timelines prescribed by the <i>Capacity Market Auction Guidelines</i>, notify each person or capacity market participant as to whether the new capacity, refurbished capacity or incremental capacity is qualified for the capacity market.</p>	

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

Item #		Stakeholder comments
1	whether you agree that the proposed new ISO rule – Section 206.1 – <i>Qualification of Capacity</i> relates to the capacity market and why or why not	
2	whether you agree that the proposed new ISO rule – Section 206.1 – <i>Qualification of Capacity</i> should [or should not] be in effect for a fixed term and why or why not	
3	whether you understand and agree with the objective or purpose of the proposed new ISO rule – Section 206.1 – <i>Qualification of Capacity</i> and whether, in your view, the proposed new ISO rule – Section 206.1 – <i>Qualification of Capacity</i> meets the objective or purpose	
4	how, in your view, the proposed new ISO rule – Section 206.1 – <i>Qualification of Capacity</i> affects the performance of the capacity market and the electricity market	
5	your views on any analysis conducted or commissioned by the AESO supporting the proposed new ISO rule – Section 206.1 – <i>Qualification of Capacity</i>	
6	whether you agree with the proposed new ISO rule – Section 206.1 – <i>Qualification of Capacity</i> taken together with all ISO rules and in light of the principle of a fair, efficient and openly competitive market	
7	whether you would suggest any alternatives to the proposed new ISO rule – Section 206.1 – <i>Qualification of Capacity</i>	

Item #		Stakeholder comments
8	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	
9	whether you agree that the proposed provisional rule supports the public interest and why or why not	

Please provide your views on the type of content that should be included in an information document associated with the proposed new ISO rule – Section 206.1– Qualification of Capacity

EnerNOC supports the asset-specific qualification requirements for demand response assets. The sales-plan approach which has been proposed by the AESO is an industry standard and this method, coupled with the correct financial assurance, will ensure that demand response resources who clear the Auction will be ready to participate on day 1 of the commitment period.

Further information to register as a Capacity Market Participant should include details on the market participant such as previous experience as an aggregator/Curtailment Service Provider (CSP) – other jurisdictions, size of portfolios, experience of team members.

For demand response resources/assets qualification, EnerNOC recommends the following content be included:

1. Show of Interest
2. Customer Acquisition Plan
3. Funding plan
4. A support of market sizing –An example of a support document typically is a market sizing analysis in Excel that contains census data, industry data, existing and former customer data, etc.
5. Security deposit

Metering:

4(1)(i)(ii) has or will have the appropriate metering the ISO specifies for each asset in the aggregation;

The information document should provide for flexibility with metering requirements. Although the current fleet in the Alberta system maintains connectivity to the AESO control room via SCADA, the market is transitioning to a more a decentralized system, with new resources such as aggregated loads, aggregated Distributed Energy Resources, and smaller resource types. The value of these new resources may be lost when metering requirements are based on large centralized generation. Many markets allow for less stringent telemetry requirements for resources below certain MW size thresholds to remove this barrier for entry for smaller resource types.



Proposed New ISO rule – Section 206.4 – Offers and Bids for the Capacity Market

Period of Comment:	August 13, 2018	through	August 31, 2018	Contact:	Sarah Griffiths
Comments From:	EnerNOC			Phone:	416-697-3744
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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 by blacklining the proposed language below.

Section	Subsection	Proposed language	Stakeholder comments
		Applicability	
1		Section 206.4 applies to: <ul style="list-style-type: none"> (a) a capacity market participant with an asset that has an assigned uniform capacity value; and (b) the ISO. 	
		Requirements Obligation to Offer and Offer Content for a Base Auction	
2	(1)	A capacity market participant must submit an offer for a base auction in respect of an asset that: <ul style="list-style-type: none"> (a) has an assigned uniform capacity value; and (b) is listed opposite the capacity market participant on the list the ISO publishes pursuant to Section 201.10 of the ISO rules, Capacity Market 	

Section	Subsection	Proposed language	Stakeholder comments
		<i>Participant Registration.</i>	
2	(2)	<p>A capacity market participant must ensure its offer volume for an asset in a base auction equals the asset’s uniform capacity value, unless it is an aggregated resource.</p>	<p>Will the term “uniform capacity value” have the definition as UCAP? The market rule cannot be clearly interpreted without a clear definition.</p> <p>If the uniform capacity value is, in fact, the same as UCAP, having an aggregated resource such as demand response bid at its uniform capacity value will effectively negate its flexibility benefits. The value of an aggregated portfolio is different than that of a traditional generator, and this rule is based on the understanding of a traditional resource, which has a static MW number attached to it.</p> <p>Aggregated resources should be able to bid up to their UCAP (or uniform capacity value). The market should recognize that the aggregated resource will have year over year changes based on the portfolio it builds for the commitment year. This is especially true for aggregated demand response resources.</p> <p>This is most applicable to small assets that can be aggregated to participate together. The benefit of flexibility of these assets and the benefits of portfolio management strategies to ensure performance for an aggregation will be lost with this rule.</p> <p>Inaccurate or speculative bidding can be stopped by ensuring the right qualification rules and penalty mechanisms are in place to ensure Capacity Market Participants are ready for day 1 of the commitment period.</p>
2	(3)	<p>A capacity market participant must include in each capacity block in an offer for a base auction:</p> <p>(a) a price in \$/kW-year to the nearest cent per kW-year which, subject to Section 206.7, of the ISO rules, <i>Capacity Market Mitigation</i>, is:</p>	

Section	Subsection	Proposed language	Stakeholder comments
		<ul style="list-style-type: none"> (i) greater than or equal to \$0/kW-year; and (ii) less than or equal to the maximum price established by the demand curve; and (b) a quantity in MW that is greater than or equal to than 1 MW. 	
2	(4)	The ISO must, if a capacity market participant does not submit an offer in accordance with subsections 2(1), 2(2) or 2(3), assign an offer price of \$0/kW-year for the offer volume equal to the asset's assigned uniform capacity value .	
		Obligation to Offer and Offer Content for a Rebalancing Auction	
3	(1)	<p>A capacity market participant must submit an offer for a rebalancing auction in respect of an asset that:</p> <ul style="list-style-type: none"> (a) has an assigned uniform capacity value greater than the capacity commitment; and (b) is listed opposite the capacity market participant on the list the ISO publishes pursuant to Section 201.10 of the ISO rules, <i>Capacity Market Participant Registration</i>. 	Similar to the comment in 2(2), this rule assumes all resources participating in the capacity market are traditional generators. Aggregated resources, such as demand response assets, do not have a fixed capacity. Their portfolio can expand and contract based on market conditions, customer load, and aggregation. It may make economic sense for an aggregated demand response resource to only bid half of their UCAP/uniform capacity value due to the changing nature of the market. By requiring an aggregated asset to participate in rebalancing auctions with any leftover capacity (i.e. uniform capacity value greater than the capacity commitment), you will lose the flexibility of non-traditional generators, which is a benefit to the market.
3	(2)	A capacity market participant must ensure its offer volume for an asset in a rebalancing auction equals the difference between the asset's uniform capacity value and its capacity commitment .	See comment for 3(1) above.
3	(3)	A capacity market participant must include in each capacity block in an offer for a	

Section	Subsection	Proposed language	Stakeholder comments
		<p>rebalancing auction:</p> <ul style="list-style-type: none"> (a) a price in \$/kW-year to the nearest cent per kW-year which is: <ul style="list-style-type: none"> (i) greater than or equal to \$0/kW-year; and (ii) less than or equal to the maximum price established by the demand curve; and (b) a quantity in MW that is equal to or greater than 1 MW. 	
3	(4)	<p>The ISO must, if a capacity market participant does not submit an offer in accordance with subsections 3(1), 3(2) or 3(3), assign an offer price of \$0/kW-year for the offer volume equal to the difference between the asset's uniform capacity value and its capacity commitment.</p>	
		<p>Designation of Flexible Blocks or Inflexible Blocks for Offers</p>	
4	(1)	<p>A capacity market participant must, except for an asset with incremental capacity, designate in an offer:</p> <ul style="list-style-type: none"> (a) the lowest priced capacity block as a flexible block or inflexible block; and (b) all other capacity blocks as flexible blocks. 	
4	(2)	<p>A capacity market participant must, for an asset with incremental capacity, designate in an offer all capacity blocks as flexible blocks except in the following circumstances:</p> <ul style="list-style-type: none"> (a) the lowest priced capacity block may be designated as an inflexible block; or (b) in the event that: 	

Section	Subsection	Proposed language	Stakeholder comments
		<p>(i) the lowest priced capacity block contains only incremental capacity;</p> <p>(ii) there is a capacity block that contains only non-incremental capacity; and</p> <p>(iii) there is no lower priced capacity block that contains both incremental capacity and non-incremental capacity than the lowest priced capacity block that contains no incremental capacity,</p> <p>the lowest priced capacity block containing only non-incremental capacity may be designated as an inflexible block, as demonstrated in Appendix 1.</p> <p>(c) in the event that:</p> <p>(i) the lowest priced capacity block contains only non-incremental capacity;</p> <p>(ii) there is a capacity block that contains only incremental capacity; and</p> <p>(iii) there is no lower priced capacity block that contains both incremental capacity and non-incremental capacity than the lowest priced capacity block that contains only incremental capacity,</p> <p>the lowest priced capacity block containing only incremental capacity may be designated as an inflexible block, as demonstrated in Appendix 1.</p>	
		<p>Additional Offer Content for Incremental Capacity</p>	
5		<p>A capacity market participant must, for an asset with incremental capacity, include in each capacity block in an offer a declaration of the quantity in MW within a capacity block that is incremental capacity.</p>	

Section	Subsection	Proposed language	Stakeholder comments
		<p>Additional Offer Content for Refurbished Capacity</p>	
6	(1)	<p>A capacity market participant must, that has failed the market power screen in accordance with Section 206.7, of the ISO rules, <i>Capacity Market Mitigation</i>, for an asset with refurbished capacity, submit:</p> <ul style="list-style-type: none"> (a) a first offer comprised of one capacity block that is an inflexible block for an asset with refurbished capacity qualified by the ISO; and (b) a second offer based on the offer the capacity market participant would have submitted had the ISO not qualified the refurbished capacity, <p>unless the capacity market participant declared to permanently delist the refurbished capacity pursuant to Section 206.1 of the ISO rules, <i>Qualification of Capacity</i> in the event it fails to obtain a capacity commitment.</p>	
6	(2)	<p>A capacity market participant may, if it has submitted an offer in accordance with subsection 6(1) and the offer that is referred to in subsection 6(1)(a) does not clear, submit in the next base auction:</p> <ul style="list-style-type: none"> (a) an offer comprised of one capacity block that is an inflexible block for an asset with refurbished capacity qualified by the ISO; or (b) an offer based on the offer the capacity market participant would have submitted had the ISO not qualified the refurbished capacity. 	
6	(3)	<p>A capacity market participant must, in the event that the capacity market participant submitted an offer in accordance with subsection 6(2)(a) and the offer did not clear, permanently delist the asset.</p>	

Section	Subsection	Proposed language	Stakeholder comments
6	(4)	A capacity market participant must ensure that an offer has not been submitted for the asset in the manner described in subsection 6(1) prior to submitting an offer in accordance with subsection 6(1).	
		Bid Content	
7	(1)	<p>A capacity market participant with a capacity commitment may submit a bid in a rebalancing auction:</p> <ul style="list-style-type: none"> (a) for a quantity in MW that is equal to or greater than 1 MW and less than or equal to the capacity commitment; and (b) that is priced at a price in \$/kW-year to the nearest cent per kW-year which is greater than or equal to \$0/kW-year. 	
7	(2)	<p>A capacity market participant with a capacity commitment must submit a bid, priced at \$0.01/kW-year above the maximum price established by the demand curve, in accordance with the following:</p> <ul style="list-style-type: none"> (a) if the asset's assigned uniform capacity value for the last rebalancing auction is lower than its capacity commitment, the capacity market participant must submit a bid for the difference between the capacity commitment and the assigned uniform capacity value; (b) subject to subsection 7(2)(d), if the ISO determines, before the first rebalancing auction, that an asset is unable to meet the milestone requirements in accordance with Section 206.5 of the ISO rules, <i>Forward Period Requirements</i>, a capacity market participant must submit a bid equal to its entire capacity commitment in the first rebalancing auction; 	<p>See comments on 3(1).</p> <p>At this time, without seeing what is included in ISO rule 205.5 it is difficult to comment on the proposed rules 206.4 s.7(2)(a)-(d) and whether or not they meet the intent of the Comprehensive Market Design. Information on the ISO requirements to determine whether or not an asset is able or unable to meet the milestone will be very important. Additionally, is there any leeway for the market participant to shed a portion of its capacity commitment in a subsequent auction?</p>

Section	Subsection	Proposed language	Stakeholder comments
		<p>(c) subject to subsection 7(2)(d), if the ISO determines, before the last rebalancing auction, that an asset is unable to meet the milestone requirements in accordance with Section 206.5 of the ISO rules, <i>Forward Period Requirements</i>, a capacity market participant must submit a bid equal to its entire capacity commitment in the last rebalancing auction; or</p> <p>(d) if the ISO determines, before the last rebalancing auction, that an aggregation of load assets is unable to meet the milestone requirements in accordance with Section 206.5 of the ISO rules, <i>Forward Period Requirements</i>, a capacity market participant must submit a bid for the difference between the capacity commitment and the assigned uniform capacity value for the last rebalancing auction.</p>	
7	(3)	The ISO must, if a capacity market participant does not submit a bid in accordance with subsection 7(2), assign a bid price of \$0.01/kW-year above the maximum price established by the demand curve for the bid volume required in subsection 7(2).	
		Submission of Offer and Bid for the Same Asset in a Rebalancing Auction	
8		A capacity market participant that submits an offer and bid for the same asset in a rebalancing auction must price the capacity blocks such that the highest priced capacity block for the bid is less than the lowest priced capacity block for the offer .	
		Designation of Flexible Blocks or Inflexible Blocks for Bids	
9		<p>A capacity market participant must designate in a bid:</p> <p>(a) the lowest priced capacity block as a flexible block or inflexible block; and</p>	

Section	Subsection	Proposed language	Stakeholder comments
		(b) all other capacity blocks as flexible blocks .	
		Offering Window	
10	(1)	The ISO must specify the offering window for a base auction or rebalancing auction in the <i>Capacity Market Auction Guidelines</i> .	
10	(2)	The ISO may change or extend the offering window in the event of system unavailability and the ISO determines that such unavailability warrants a change or extension to the offering window.	
10	(3)	The ISO must notify capacity market participants of any change or extension to an offering window made pursuant to subsection 10(2).	
10	(4)	A capacity market participant must submit an offer or bid during the offering window.	
		Offer Submission Methods	
11		A capacity market participant must submit an offer or bid for a base auction or rebalancing auction in a manner the ISO determines.	

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

Item #		Stakeholder comments
1	whether you agree that the proposed new ISO rule – Section 206.4 – <i>Offers and Bids for the Capacity Market</i> relates to the capacity market and why or why not	
2	whether you agree that the proposed new ISO rule – Section 206.4 – <i>Offers and Bids for the Capacity Market</i> should [or should not] be in effect for a fixed term and why or why not	
3	whether you understand and agree with the objective or purpose of the proposed new ISO rule – Section 206.4 – <i>Offers and Bids for the Capacity Market</i> and whether, in your view, the proposed new ISO rule – Section 206.4 – <i>Offers and Bids for the Capacity Market</i> meets the objective or purpose	
4	how, in your view, the proposed new ISO rule – Section 206.4 – <i>Offers and Bids for the Capacity Market</i> affects the performance of the capacity market and the electricity market	
5	your views on any analysis conducted or commissioned by the AESO supporting the proposed new ISO rule – Section 206.4 – <i>Offers and Bids for the Capacity Market</i>	
6	whether you agree with the proposed new ISO rule – Section 206.4 – <i>Offers and Bids for the Capacity Market</i> taken together with all ISO rules and in light of the principle of a fair, efficient and openly competitive market	

Item #		Stakeholder comments
7	whether you would suggest any alternatives to the proposed new ISO rule – Section 206.4 – <i>Offers and Bids for the Capacity Market</i>	
8	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	
9	whether you agree that the proposed provisional rule supports the public interest and why or why not	

Please provide your views on the type of content that should be included in an information document associated with the proposed new ISO rule – Section 206.4 – Offers and Bids for the Capacity Market

7(2)(a)-(d) – information will the ISO use to determine whether or not an asset has met their milestones. There should be some discretion as aggregators of demand response assets will do a majority of the work after the 1st rebalancing auction, as laid out in their sales plan/milestones submitted during qualification.

Proposed New ISO rule – Section 206.6 – *Base Auction and Rebalancing Auction*

Period of Comment:	August 13, 2018	through	August 31, 2018	Contact:	Sarah Griffiths
Comments From:	EnerNOC			Phone:	416-697-3744
Date [2018/08/30]:				Email:	Sarah.griffiths@enernoc.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 by blacklining the proposed language below.

Section	Subsection	Proposed language	Stakeholder comments
		Applicability	
1		Section 206.6 applies to: (a) the ISO .	
		Requirements Base Auction Timeline	
2	(1)	The ISO must conclude a base auction no later than 36 months prior to the start of the obligation period .	
2	(2)	The ISO must: (a) notwithstanding subsection 2(1), conclude a base auction for the first 3 obligation periods in accordance with the timelines established in the <i>Capacity Market Auction Guidelines</i> ; and (b) remove this subsection 2(2) on or about the day the base auction for the third	

Section	Subsection	Proposed language	Stakeholder comments
		<p>obligation period is concluded.</p>	
		<p>Rebalancing Auction Timeline</p>	
3	(1)	<p>The ISO must, subject to subsection 3(2), conclude two rebalancing auctions at no later than 18 months and 3 months, but no sooner than 15 months and 6 months, respectively, prior to the start of the obligation period.</p>	<p>EnerNOC supports that the two rebalancing auctions should occur no later than 18 months and 3 months before the prior to the start of the obligation period, however there should also be a defined timeline for this auction. For example, the ISO should not be able to hold the 2nd Rebalancing Auction 12 months before the start of the obligation period. As the rule is written, this could occur.</p>
3	(2)	<p>The ISO must:</p> <ul style="list-style-type: none"> (a) notwithstanding subsection 3(1), conclude one rebalancing auction at no later than 3 months prior to the start of the obligation periods for the first 3 obligation periods; and (b) remove this subsection 3(2) on or about the day the rebalancing auction for the third obligation period is concluded. 	
		<p>Publication of Capacity Market Auction Guidelines</p>	
4		<p>The ISO must publish the <i>Capacity Market Auction Guidelines</i> prior to each base auction and rebalancing auction.</p>	
		<p>Sealed-bid, Single-round Base Auction and Rebalancing Auction</p>	
5		<p>The ISO must, for each base auction and rebalancing auction, use a sealed-bid, single-round auction design to establish a single clearing price.</p>	
		<p>Auction Results</p>	

Section	Subsection	Proposed language	Stakeholder comments
6	(1)	The ISO must, following a base auction and rebalancing auction , notify the capacity market participant of its capacity commitment by asset within one week from the base auction and rebalancing auction OR as per timing specified in the information document.	Timing for the notification should be in the market rules (or at least the information documents). Resources should expect results of a capacity auction within 1 week of the actual auction.
6	(2)	<p>The ISO must, as soon as practicable following a base auction and rebalancing auction, publish the results of the base auction or rebalancing auction, including:</p> <ul style="list-style-type: none"> (a) the clearing price; (b) the total capacity procured; (c) the total capacity procured by technology type; (d) the total capacity procured from assets associated with an offer for new capacity, incremental capacity and refurbished capacity; and (e) for the last rebalancing auction for an obligation period, a list of each asset subject to a capacity commitment. 	

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

Item #		Stakeholder comments
1	whether you agree that the proposed new ISO rule – Section 206.6 – <i>Base Auction and Rebalancing Auction</i> relates to the capacity market and why or why not	
2	whether you agree that the proposed new ISO rule – Section 206.6 – <i>Base Auction and Rebalancing Auction</i> should [or should not] be in effect for a fixed term and why or why not	
3	whether you understand and agree with the objective or purpose of the proposed new ISO rule – Section 206.6 – <i>Base Auction and Rebalancing Auction</i> and whether, in your view, the proposed new ISO rule – Section 206.6 – <i>Base Auction and Rebalancing Auction</i> meets the objective or purpose	
4	how, in your view, the proposed new ISO rule – Section 206.6 – <i>Base Auction and Rebalancing Auction</i> affects the performance of the capacity market and the electricity market	
5	your views on any analysis conducted or commissioned by the AESO supporting the proposed new ISO rule – Section 206.6 – <i>Base Auction and Rebalancing Auction</i>	
6	whether you agree with the proposed new ISO rule – Section 206.6 – <i>Base Auction and Rebalancing Auction</i> taken together with all ISO rules and in light of the principle of a fair, efficient and openly competitive market	

Item #		Stakeholder comments
7	whether you would suggest any alternatives to the proposed new ISO rule – Section 206.6 – <i>Base Auction and Rebalancing Auction</i>	
8	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	
9	whether you agree that the proposed provisional rule supports the public interest and why or why not	

Please provide your views on the type of content that should be included in an information document associated with the proposed new ISO rule – Section 206.6 – Base Auction and Rebalancing Auction

As noted above (6(1)), the timing of the results of the auction and rebalancing auctions should be defined.

Proposed Amended ISO rule – Section 303.1 *Load Shed Service*

Period of Comment:	August 13, 2018	through	August 31, 2018	Contact:	Sarah Griffiths
Comments From:	EnerNOC			Phone:	416-697-3744
Date [2018/08/30]:				Email:	Sarah.griffiths@enernoc.com

Please provide comments relating to the subsection of the proposed amendments to the 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 by blacklining the proposed language below.

Section	Subsection	Proposed language	Stakeholder comments
		Determining Amount to Arm	
3	(3)	The ISO must set the load shed service arming level at the beginning of the scheduling hour but may modify it if the requirement changes during the scheduling hour.	Does the AESO anticipate the need for mid-hour arming scheduling changes compared to the current operation of the program?

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

Item #		Stakeholder comments
1	whether you agree that amended ISO rule – Section 303.1 <i>Load Shed Service</i> relates to the capacity market and why or why not	
2	whether you agree that amended ISO rule – Section 303.1 <i>Load Shed Service</i> should [or should not] be in effect for a fixed term and why or why not	
3	whether you understand and agree with the objective or purpose of amended ISO rule – Section 303.1 <i>Load Shed Service</i> and whether, in your view, Section 303.1 <i>Load Shed Service</i> meets the objective or purpose	
4	how, in your view, amended ISO rule – Section 303.1 <i>Load Shed Service</i> affects the performance of the capacity market and the electricity market	
5	your views on any analysis conducted or commissioned by the AESO supporting amended ISO rule – Section 303.1 <i>Load Shed Service</i>	
6	whether you agree with amended ISO rule – Section 303.1 <i>Load Shed Service</i> taken together with all ISO rules and in light of the principle of a fair, efficient and openly competitive market	
7	whether you would suggest any alternatives to amended ISO rule – Section 303.1 <i>Load Shed Service</i>	

Item #		Stakeholder comments
8	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	
9	whether you agree that the proposed provisional rule supports the public interest and why or why not	

Please provide your views on the type of content that should be included in an information document associated with amended ISO rule – Section 303.1 Load Shed Service

A large empty rectangular box intended for stakeholder comments.