

Development of Proposed Amendments to Section 306.7 of the ISO rules, *Mothball Outage Reporting*

<p><b>Period of Comment:</b> October 14, 2020 through October 29, 2020</p> <p><b>Comments From:</b> Heartland Generation Ltd. (Heartland Generation)</p> <p><b>Date:</b> [2020/10/29]</p>	<p><b>Contact:</b> Shanelle Sinclair</p> <p><b>Phone:</b> 403.369.7769</p> <p><b>Email:</b> Shanelle.sinclair@heartlandgeneration.com</p>
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Instructions:

1. Please fill out the section above as indicated.
2. Please refer back to the Consultation Letter under the “Attachments” section to view materials related to the development of amendments to Section 306.7 of the ISO rules, *Mothball Outage Reporting* (the “Mothball rule”).
3. Please respond to the questions below and provide your specific comments (if any). Blank boxes will be interpreted as favourable comments.

**The AESO is seeking comments from Stakeholders on the development of amendments to the Mothball rule with regard to the following matters:**

	Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
1.	Do you agree or disagree that the issues identified require the development of an amended Mothball rule and a review of the broader framework for removing generating capacity from the market? Please comment.	<p>The current rule has been a feature of the market for several years and continues to fulfil its intended purpose; however, it was implemented through an expedited process. While the AESO may believe that it has a duty to consult further given the circumstances, that does not necessarily mean that the current rule is deficient and must be amended. Similarly, while there might be “certain matters that may not have been fully addressed when the Mothball rule was originally developed,” that possibility alone does not necessarily warrant a comprehensive review of the rule, as the AESO has proposed. If the AESO is only commencing a consultation with stakeholders because of its prior commitment, it should only proceed if stakeholders strongly support a Mothball rule review at this time.</p> <p>If, however, the AESO has developed a preliminary view of potential problems with the current Mothball Rule and/or a substantive reason why consultation is needed at this time, the AESO should share these concerns with market participants during the first consultation session.</p>

		Given the above, Heartland Generation believes that there could be some possible evolutionary amendments to the Mothball Rule to support competitive markets and to provide increased flexibility for economic decisions.
2.	Do you agree or disagree with the potential objectives or purpose of the review of the Mothball rule and a review of the broader framework for removing generating capacity from the market? Please comment.	The objectives and purpose of the proposed consultation are very broad and open the door to a comprehensive review of the rule. At minimum, Heartland Generation submits that the AESO should stipulate from the outset that the purpose of any consultation would not be to re-litigate the rule's existence. Mothball outages are an important and necessary feature of Alberta's energy-only market that allow suppliers to make economic decisions regarding the availability of their assets; the existence of mothball outages should not be up for discussion. Because of their importance, Heartland Generation submits that any consultation on mothball outages should focus on increasing the flexibility and clarity provided to market participants (i.e. reporting and notification timelines, maximum duration, etc.).
3.	Do you agree or disagree with the proposed form of consultation? Please comment.	Like with other market-related initiatives, the Mothball rule should undergo evolutionary and measured changes, whereby only targeted and specific amendments are suggested and warranted. Heartland Generation therefore suggests that the AESO use the first consultation session to narrow the scope of the remaining process and/or decide if a consultation is warranted at this time.
4.	Do you intend to participate in any related consultation? <b>OR</b> Do you agree that no consultation group is required for this rule development? Please comment.	Heartland Generation will participate in the consultation if it proceeds.
5.	Do you agree or disagree that the development of proposed amendments to the Mothball rule should proceed at this time?	Please see Heartland Generation's responses to questions 1 – 4.



6.	Do you have any additional comments?	Heartland Generation does not have any further comments.
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