

Terms and definitions to be added for use in the ISO rules:

“**base auction**” means the first auction for **capacity** for an **obligation period**.

“**capacity**” as defined in the **Act**, with respect to the capacity market means the ability to supply electric energy or reduce electric energy consumption as measured in MW.

“**capacity block**” means one of the price and quantity pairs the **ISO** allocates to an asset for a **base auction** or **rebalancing auction** for the purposes of submitting an **offer** or **bid** in the capacity market.

“**capacity commitment**” means an obligation to deliver, during an **obligation period**, a volume of an **offer** that has cleared in a **base auction** or a **rebalancing auction**.

“**capacity market participant**” means a **person** registered with the **ISO** in accordance with Section 201.10 of the **ISO rules**, *Capacity Market Participant Registration*, for the capacity market.

“**electricity market participant**” as defined in the **Act**, means

- (i) any person that supplies, generates, transmits, ~~distributes~~ distributes, trades, exchanges, purchases or sells electricity, electric energy, electricity services or ancillary services, or
- (ii) any broker, brokerage or forward exchange that trades or facilitates the trading of electricity, electric energy, electricity services or ancillary services.

“**incremental capacity**” means additional **capacity** that will result from retrofitting an asset in a manner that will increase the **maximum capability** of the asset, where the retrofit has not been completed.

“**new capacity**” means **capacity** from an asset:

- (i) that has not had an **offer** clear in a **base auction** or **rebalancing auction**; and
- (ii) in the case of a **generating unit** or **aggregated generating facility**, that has not completed energization and **commissioning** prior to the **obligation period**.

“**obligation period**” means a 12 month period running continuously from November 1 to October 31 of the following year.

“**rebalancing auction**” means an auction for **capacity** conducted after a **base auction** for an **obligation period**.

“**refurbished capacity**” means **capacity** from an asset that will undergo retrofitting, where such retrofit has not been completed and will result in either:

- (i) additional **capacity** that will significantly increase the **maximum capability** of the asset; or
- (ii) significant monetary investment for the retrofit.

New defined terms used in Set 1 Capacity Market ISO rules with definitions to be released at the time of the Set 2 Capacity Market ISO rules

“**transmission congestion constraints**”

“**uniform capacity value**”

Set 1 Capacity Market Terms and Definitions

Amended defined terms used in Set 1 Capacity Market ISO rules with definitions to be released at the time of the Set 2 Capacity Market ISO rules

“agent” “flexible

block” “inflexible

block” “offer”

Proposed New ISO rule – Section 201.10 – Capacity Market Participant Registration

Period of Comment:	August 13, 2018	through	August 31, 2018	Contact:	Shanelle Sinclair
Comments From:	Market Surveillance Administrator			Phone:	403-705-3180
Date [yyyy/mm/dd]:	2018-08-22			Email:	shanelle.sinclair@albertamsa.ca

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 201.10 applies to: <ul style="list-style-type: none"> (a) a person with an asset that the ISO has qualified pursuant to Section 201.10<u>206.1</u> of the ISO rules, <i>Qualification of Capacity</i>; (b) a pool participant with a generating unit, aggregated generating facility or energy storage facility an maximum capability equal to or greater than 1 MW, unless such generating unit, aggregated generating facility or energy storage facility is the subject of a renewable electricity support agreement in connection with rounds 1, 2 or 3 of the Renewable Electricity Program; (c) a capacity market participant; and (d) the ISO. 	<u>Wrong section was referenced.</u>

		<p>Requirements</p> <p>Capacity Market Participant</p>	
2		Each person or pool participant must register a capacity market participant in the manner the ISO specifies.	
		ISO Requirement to Maintain Lists	
3		The ISO must maintain and make available on the AESO website, one or more lists containing up to date information on the capacity market participant , any agents and associated assets.	
		Capacity Market Participant Updates	
4		A capacity market participant must, if it is on the ISO's list, provide updated information, as soon as practicable, regarding its capacity market participant registration, its agents and any asset listed opposite the capacity market participant on the ISO's list.	
		Termination of Capacity Market Participant	
5		The ISO may terminate a capacity market participant registration if the capacity market participant retires all assets listed opposite the capacity market participant on the ISO list.	

		Liability of Capacity Market Participant	
6		A capacity market participant that is or may become liable under the ISO rules in connection with its activities as a capacity market participant remains liable after the date of retirement of its associated asset and despite ceasing to be a capacity market participant .	

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 201.10 – <i>Capacity Market Participant Registration</i> relates to the capacity market and why or why not	
2	whether you agree that the proposed new ISO rule – Section 201.10 – <i>Capacity Market Participant Registration</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 201.10 – <i>Capacity Market Participant Registration</i> and whether, in your view, the proposed new ISO rule – Section 201.10 – <i>Capacity Market Participant Registration</i> meets the objective or purpose	
4	how, in your view, the proposed new ISO rule – Section 201.10 – <i>Capacity Market Participant Registration</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 201.10 – <i>Capacity Market Participant Registration</i>	
6	whether you agree with the proposed new ISO rule – Section 201.10 – <i>Capacity Market Participant Registration</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 201.10 – <i>Capacity Market Participant Registration</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 201.10 – Capacity Market Participant Registration.

Proposed New ISO rule – Section 201.12 – Capacity Market Block Allocation

Period of Comment:	August 13, 2018	through	August 31, 2018	Contact:	Shanelle Sinclair
Comments From:	Market Surveillance Administrator			Phone:	403-705-3180
Date [yyyy/mm/dd]:	2018-08-22			Email:	shanelle.sinclair@albertamsa.ca

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 201.12 applies to: (a) the ISO.	
		Requirements Capacity Block Allocation	
2	(1)	The ISO must allocate to each capacity market participant one unique identifier for each associated asset.	
2	(2)	The ISO must, subject to subsection 2(3), allocate 7 capacity blocks to submit an offer and 7 capacity blocks to submit a bid to each asset with a uniform capacity value equal to or greater than 1 MW.	
2	(3)	The ISO must, in the case of an asset with refurbished capacity that declares to submit two offers in accordance with Section 206.1 of the ISO rules, <i>Qualification of Capacity</i> , allocate:	Section 206.1 does not discuss offers. Is the purpose of the reference to 206.1 to ensure they meet the qualifications for refurbished capacity?

Section	Subsection	Proposed language	Stakeholder comments
		<p>(a) one capacity block for the first offer referred to in Section 206.4 of the ISO rules, <i>Offers and Bids for Capacity</i>, and</p> <p>(b) 7 capacity blocks for the second offer referred to in Section 206.4 of the ISO rules, <i>Offers and Bids for Capacity</i>.</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 201.12 – <i>Capacity Market Block Allocation</i> relates to the capacity market and why or why not	
2	whether you agree that the proposed new ISO rule – Section 201.12 – <i>Capacity Market Block Allocation</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 201.12 – <i>Capacity Market Block Allocation</i> and whether, in your view, the proposed new ISO rule – Section 201.12 – <i>Capacity Market Block Allocation</i> meets the objective or purpose	
4	how, in your view, the proposed new ISO rule – Section 201.12 – <i>Capacity Market Block Allocation</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 201.12 – <i>Capacity Market Block Allocation</i>	
6	whether you agree with the proposed new ISO rule – Section 201.12 – <i>Capacity Market Block Allocation</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 201.12 – <i>Capacity Market Block Allocation</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 201.12 – Capacity Market Block Allocation

Proposed New ISO rule – Section 201.13 – Capacity Market Clearing

Period of Comment:	August 13, 2018	through	August 31, 2018	Contact:	Shanelle Sinclair
Comments From:	Market Surveillance Administrator			Phone:	403-705-3180
Date [yyyy/mm/dd]:	2018-08-22			Email:	shanelle.sinclair@albertamsa.ca

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 201.13 applies to: (a) the ISO .	
		Requirements Auction Clearing	
2	(1)	The ISO must use a clearing process that clears offers and bids , as applicable, in a manner that maximizes social surplus with consideration of the following: (a) a lower priced capacity block in an offer will be cleared before a higher priced capacity block in an offer ; (b) a higher priced capacity block in a bid will be cleared before a lower priced capacity block in a bid ; (c) when multiple equivalent flexible blocks are submitted at the clearing price and result in the same social surplus, clear such equivalent flexible blocks on a pro-rata	Missing a case for when flexible and inflexible blocks are submitted at the clearing and result in the same social surplus. Require the outcome to be listed in the rule.

Section	Subsection	Proposed language	Stakeholder comments
		<p>basis; and</p> <p>(d) when multiple equivalent inflexible blocks are submitted at the clearing price and result in the same social surplus, clear such equivalent inflexible blocks on a random basis.</p>	
2	(2)	The ISO may perform the clearing process more than once prior to establishing the clearing price.	
		Transfer Path Limits Calculation	
3		<p>The ISO must determine the limits, for each base auction or rebalancing auction, on each of the British Columbia transfer path, Montana transfer path, the Saskatchewan transfer path, and the combined British Columbia and Montana transfer paths by averaging the hourly limits for each of the above as follows:</p> <p>(a) for the British Columbia transfer path, for each of the 250 tightest supply cushion hours per year for the previous 5 years to the base auction or rebalancing auction, as applicable, by assigning a hourly limit based on the minimum of:</p> <ul style="list-style-type: none"> (i) the hourly import available transfer capability for the British Columbia transfer path; or (ii) the long-term firm transmission service on the British Columbia transfer path. <p>(b) for the Montana transfer path, for each of the 250 tightest supply cushion hours per year for the previous 5 years to the base auction or rebalancing auction, as applicable, by assigning a hourly limit based on the minimum of:</p> <ul style="list-style-type: none"> (i) the hourly import available transfer capability for the Montana transfer path; or 	<p>Minor nits</p> <p>For subsection 3(d)(i) missing hourly reference. This provides some clarity from an enforcement perspective.</p>

Section	Subsection	Proposed language	Stakeholder comments
		<p>(ii) the long-term firm transmission service on the Montana transfer path.</p> <p>(c) for the Saskatchewan transfer path, for each of the 250 tightest supply cushion hours per year for the previous 5 years to the base auction or rebalancing auction, as applicable, by assigning an hourly limit based on the minimum of:</p> <p>(i) the hourly import available transfer capability for the Saskatchewan transfer path; or</p> <p>(ii) the long-term firm transmission service on the Saskatchewan transfer path.</p> <p>(d) for the combined British Columbia and Montana transfer paths, for each of the 250 tightest supply cushion hours per year for the previous 5 years to the base auction or rebalancing auction, as applicable, by assigning an hourly limit based on the minimum of:</p> <p>(i) the combined hourly import available transfer capability for the British Columbia and Montana transfer paths prior to LSSi arming; or</p> <p>(ii) combined long-term firm transmission for the British Columbia and Montana transfer paths.</p>	
		<p>Consideration of Transmission Congestion Constraints and Transfer Path Limits in Clearing Process</p>	
4	(1)	<p>The ISO may, in the event that the ISO determines that the energy associated with an offer may be unable to be delivered to the interconnected electric system during the obligation period due to either a transmission congestion constraint or a limit on an Alberta intertie determined in accordance with subsection 3:</p>	

Section	Subsection	Proposed language	Stakeholder comments
		<ul style="list-style-type: none"> (a) not clear the offer; (b) clear a portion of the offer; or (c) if there are multiple flexible blocks impacted by the same transmission congestion constraint or limit on an Alberta intertie either: <ul style="list-style-type: none"> (i) not clear the flexible blocks; or (ii) when multiple equivalent flexible blocks are submitted at the same price and result in the same social surplus, clear such equivalent flexible blocks on a pro-rata basis. (d) if there are multiple inflexible blocks impacted by the same transmission congestion constraint or limit on an Alberta intertie either: <ul style="list-style-type: none"> (i) not clear the inflexible blocks; or (ii) when multiple equivalent inflexible blocks are submitted at the same price and result in the same social surplus, clear such equivalent inflexible blocks on a random basis. 	
4	(2)	The ISO may clear additional offers for the equivalent volume of the offers it did not clear pursuant to subsection 4(1).	
4	(3)	The ISO must, for the additional offers cleared in accordance with subsection 4(2), provide an uplift payment for the difference between the offer price and the clearing price, if the offer price of such offers is higher than the clearing price.	

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 201.13 – <i>Capacity Market Clearing</i> relates to the capacity market and why or why not	
2	whether you agree that the proposed new ISO rule – Section 201.13 – <i>Capacity Market Clearing</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 201.13 – <i>Capacity Market Clearing</i> and whether, in your view, the proposed new ISO rule – Section 201.13 – <i>Capacity Market Clearing</i> meets the objective or purpose	
4	how, in your view, the proposed new ISO rule – Section 201.13 – <i>Capacity Market Clearing</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 201.13 – <i>Capacity Market Clearing</i>	
6	whether you agree with the proposed new ISO rule – Section 201.13 – <i>Capacity Market Clearing</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 201.13 – <i>Capacity Market Clearing</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	

Item #		Stakeholder comments
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 201.13 – Capacity Market Clearing

Proposed New ISO rule – Section 206.1 – Qualification of Capacity

Period of Comment:	August 13, 2018	through	August 31, 2018	Contact:	Shanelle Sinclair
Comments From:	Market Surveillance Administrator			Phone:	403-705-3180
Date [yyyy/mm/dd]:	2018-08-22			Email:	shanelle.sinclair@albertamsa.ca

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 number needs to be updated.

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 may, in the event that the ISO determines that the energy associated with an offer may be unable to be delivered to the interconnected electric system during the obligation period due to either a transmission congestion constraint or a limit on an Alberta intertie determined in accordance with subsection 3:</p> <p>(a) not clear the offer;</p> <p>(b) clear a portion of the offer; or</p> <p>(c) if there are multiple flexible blocks impacted by the same transmission congestion constraint or limit on an Alberta intertie either:</p> <p>(i) not clear the flexible blocks; or</p> <p>(ii) when multiple equivalent flexible blocks are submitted at the same price and result in the same social surplus, clear such equivalent flexible blocks on a pro-rata basis.</p> <p>(d) if there are multiple inflexible blocks impacted by the same transmission congestion constraint or limit on an Alberta intertie either:</p> <p>(i) not clear the inflexible blocks; or</p>	<p>Note: Matrix has copied the text from Section 201.13, subsection 4(1).</p> <p>Minor nit in Section 206.1, subsection 4(1)(g):</p> <p>(g) in the case of an energy storage facility, is or will be capable of maintaining energy production at its uniform capacity value for a minimum of 4 hours;</p> <p>For subsection 4(k)(ii) the AESO needs to clarify where the capital cost escalation rate will specified or published. Should be included in the Rule itself.</p> <p>(k) in the case of refurbished capacity, will be retrofitted in a manner that will, in the opinion of the ISO, result in either:</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>

Section	Subsection	Proposed language	Stakeholder comments
		<p>(ii) when multiple equivalent inflexible blocks are submitted at the same price and result in the same social surplus, clear such equivalent inflexible blocks on a random basis.</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> <ul style="list-style-type: none"> (a) the application provided pursuant to subsection 2 is complete; and (b) the ISO is satisfied pursuant to subsection 4(1), as applicable. 	
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

Proposed New ISO rule – Section 206.2 – Self Supply Configurations

Period of Comment:	August 13, 2018	through	August 31, 2018	Contact:	Shanelle Sinclair
Comments From:	Market Surveillance Administrator			Phone:	403-705-3180
Date [yyyy/mm/dd]:	2018-08-22			Email:	shanelle.sinclair@albertamsa.ca

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 206.2 applies to: <ul style="list-style-type: none"> (a) the legal owner of a load asset that is served by one or more onsite generating units or aggregated generating facilities; (b) the City of Medicine Hat; and (c) the ISO. 	
		Requirements	
		Mandatory Requirements to Self-supply Capacity	
2	(1)	The legal owner of a load asset that is served by one or more onsite generating units or aggregated generating facilities must self-supply capacity if such site is: <ul style="list-style-type: none"> (a) metered on a net basis; or (b) is not capable of flowing energy on to the interconnected electric system. 	Section 202.6 “on-site” rather than “onsite”. Use of the each word is also not consistent within this rule. We recommend that the Rules should be consistent where possible.

Section	Subsection	Proposed language	Stakeholder comments
2	(2)	The City of Medicine Hat must self-supply capacity .	
		Option to Self-supply Capacity	
3		<p>The legal owner of a load asset that is served by one or more onsite generating units or aggregated generating facilities may choose to self-supply capacity if:</p> <ul style="list-style-type: none"> (a) such site has a bi-directional net-interval meter; (b) the generating units or aggregated generating facilities are metered on a gross basis; and (c) the generating units or aggregated generating facilities are capable of flowing energy on to the interconnected electric system. 	
		Application to Self-supply Capacity	
4		The legal owner of a load asset that is served by one or more onsite generating units or aggregated generating facilities and the City of Medicine Hat must provide the ISO , within the timelines prescribed by the <i>Capacity Market Auction Guidelines</i> , a completed application to self-supply capacity including all information or documents that the ISO specifies.	
		Approval to Self-supply Capacity	
5		The ISO must, within the timelines prescribed by the <i>Capacity Market Auction Guidelines</i> , approve an application to self-supply capacity if the site meets the criteria set out in subsections 2 or 3, as applicable.	
		Capacity from a Self-supply Configuration	
6	(1)	The legal owner of a generating unit or an aggregated generating facility in a self-	

Section	Subsection	Proposed language	Stakeholder comments
		<p>supply configuration must, in the event that:</p> <ul style="list-style-type: none"> (a) the generating unit or aggregated generating facility has excess capacity that is not serving the on-site load; and (b) the excess capacity that is not serving the on-site load has a uniform capacity value greater than or equal to 1 MW, <p>participate in the capacity market with the excess capacity that is not serving the on-site load.</p>	
6	(2)	<p>The legal owner of a load asset in a self-supply configuration may provide capacity in the capacity market with the portion of the load that is not supplied by onsite generation if the capacity has a uniform capacity value greater than or equal to 1 MW.</p>	
		<p>Changes in Self-supply Status</p>	
7	(1)	<p>The legal owner of a load asset that is served by one or more onsite generating units or aggregated generating facilities that is required to self-supply capacity pursuant to subsection 2(1) may apply to the ISO to change its self-supply status if:</p> <ul style="list-style-type: none"> (a) the legal owner installs a bi-directional net-interval meter at such site; (b) the legal owner changes generating units or aggregated generating facilities to be metered on a gross basis; and (c) the generating units or aggregated generating facilities are capable of flowing energy on to the interconnected electric system. 	<p>It may be too easy for self-suppliers to change their status. This may be hard to force self-suppliers to keep their status for a minimum of four obligation periods as required in subsection 7(2).</p>
7	(2)	<p>The legal owner of a load asset that is served by one or more onsite generating units or aggregated generating facilities that elects to self-supply capacity pursuant to subsection 3 must self-supply capacity for a minimum of 4 obligation periods unless it</p>	

Section	Subsection	Proposed language	Stakeholder comments
		can demonstrate to the ISO 's satisfaction that physical changes to the site warrant a change in self-supply status.	

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 206.2 – <i>Self Supply Configurations</i> relates to the capacity market and why or why not	
2	whether you agree that the proposed new ISO rule – Section 206.2 – <i>Self Supply Configurations</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 206.2 – <i>Self Supply Configurations</i> and whether, in your view, the proposed new ISO rule – Section 206.2 – <i>Self Supply Configurations</i> meets the objective or purpose	
4	how, in your view, the proposed new ISO rule – Section 206.2 – <i>Self Supply Configurations</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 206.2 – <i>Self Supply Configurations</i>	
6	whether you agree with the proposed new ISO rule – Section 206.2 – <i>Self Supply Configurations</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 206.2 – <i>Self Supply Configurations</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 206.2 – Self Supply Configurations

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:	Shanelle Sinclair
Comments From:	Market Surveillance Administrator			Phone:	403-705-3180
Date [yyyy/mm/dd]:	2018-08-22			Email:	shanelle.sinclair@albertamsa.ca

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)	A capacity market participant must ensure its total offer volume for an asset in a base auction equals the asset's uniform capacity value .	Minor nit to differentiate "total offer" from "offer"
2	(3)	<p>A capacity market participant must include in each capacity block in an offer for a base auction:</p> <ul style="list-style-type: none"> (a) a price in \$/kW-year to the nearest cent per kW-year which, subject to Section 206.7, of the ISO rules, Capacity Market Mitigation, 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 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 total offer volume equal to the asset's assigned uniform capacity value .	Minor nit to differentiate "total offer" from "offer"
		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 	

Section	Subsection	Proposed language	Stakeholder comments
		publishes pursuant to Section 201.10 of the ISO rules , <i>Capacity Market Participant Registration</i> .	
3	(2)	A capacity market participant must ensure its total offer volume for an asset in a rebalancing auction equals the difference between the asset's uniform capacity value and its capacity commitment .	Minor nit to differentiate "total offer" from "offer"
3	(3)	<p>A capacity market participant must include in each capacity block in an offer for a 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)	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 total offer volume equal to the difference between the asset's uniform capacity value and its capacity commitment .	Minor nit to differentiate "total offer" from "offer"
		Designation of Flexible Blocks or Inflexible Blocks for Offers	
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 	

Section	Subsection	Proposed language	Stakeholder comments
		(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: <ul style="list-style-type: none"> (i) the lowest priced capacity block contains only incremental capacity; (ii) there is a capacity block that contains only non-incremental capacity; and (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>the lowest priced capacity block containing only non-incremental capacity may be designated as an inflexible block, as demonstrated in Appendix 1.</p> (c) in the event that: <ul style="list-style-type: none"> (i) the lowest priced capacity block contains only non-incremental capacity; (ii) there is a capacity block that contains only incremental capacity; and (iii) there is no lower priced capacity block that contains both incremental capacity and non-incremental capacity than the lowest priced 	<p>The situation described in subsection (4)(2)(c), refers to the Appendix. However, this situation is not included in the Appendix.</p>

Section	Subsection	Proposed language	Stakeholder comments
		<p>capacity block that contains only incremental capacity, 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>	
		<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>	<p><u>General question: Would this be more appropriate in the base auction or the rebalancing auction?</u></p>

Section	Subsection	Proposed language	Stakeholder comments
		<p>(a) an offer comprised of one capacity block that is an inflexible block for an asset with refurbished capacity qualified by the ISO; or</p> <p>(b) an offer based on the offer the capacity market participant would have submitted had the ISO not qualified the refurbished capacity.</p>	
6	(3)	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.	
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) .	<u>The references are unclear/confusing. It is unclear if the two references to subsection 6(1) are correct, or if one of the references should refer to a different subsection.</u>
		Bid Content	
7	(1)	<p>A capacity market participant with a capacity commitment may submit a bid in a rebalancing auction:</p> <p>(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</p> <p>(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.</p>	
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> <p>(a) if the asset's assigned uniform capacity value for the last rebalancing</p>	

Section	Subsection	Proposed language	Stakeholder comments
		<p>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;</p> <p>(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, Forward Period Requirements, a capacity market participant must submit a bid equal to its entire capacity commitment in the first rebalancing auction;</p> <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, Forward Period Requirements, 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, Forward Period Requirements, 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	

Section	Subsection	Proposed language	Stakeholder comments
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		A capacity market participant must designate in a bid: <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. 	
		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

Proposed Amended ISO rule – Section 301.2 ISO Directives

Period of Comment:	August 13, 2018	through	August 31, 2018	Contact:	Shanelle Sinclair
Comments From:	Market Surveillance Administrator			Phone:	403-705-3180
Date [yyyy/mm/dd]:	2018-08-22			Email:	shanelle.sinclair@albertamsa.ca

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
		Directives the ISO Issues	
2	(1)	The ISO may issue a directive to an electricity market participant , including a directive to: <ul style="list-style-type: none"> (a) increase or decrease the real power or reactive power output, or both of them, from a facility; (b) increase or decrease the real power consumption at a load asset; (c) shut down or start up a facility; and (d) switch transmission system elements, alter planned outage or maintenance schedules, or load shed. 	
		Acknowledging Directives	
5		An electricity market participant must acknowledge receipt of a directive : <ul style="list-style-type: none"> (a) in the case of an automated message and unless the electricity market 	<u>Suggested wording to match subsection 2(2), which specifies that a directive may be verbal, electronic, or in writing.</u>

Section	Subsection	Proposed language	Stakeholder comments
		<p>participant has notified the ISO of an unavailability in accordance with subsection 4(1) by responding via the Automated Dispatch and Messaging System within 2 minutes; and</p> <p><u>(b)</u> in the case of a voice directive, by repeating the directive to the ISO.</p> <p>(b)(c) <u>In the case of a written directive, by [insert appropriate action/response]</u></p>	
4	(2)	<p><u>(2) The electricity market participant must provide notice to the AESO as soon as practical but, unless otherwise stipulated in the directive, not later than 5 minutes after determining it is unable to comply with a directive or is unable to communicate a directive to the operator, as applicable.</u></p>	<p><u>Updated wording to allow for better enforcement of -the rule. Most AESO rules use the word “practicable” rather than “practical”.</u></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 amended ISO rule – Section 301.2 <i>ISO Directives</i> relates to the capacity market and why or why not	
2	whether you agree that amended ISO rule – Section 301.2 <i>ISO Directives</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 301.2 <i>ISO Directives</i> and whether, in your view, Section 301.2 <i>ISO Directives</i> meets the objective or purpose	
4	how, in your view, amended ISO rule – Section 301.2 <i>ISO Directives</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 301.2 <i>ISO Directives</i>	
6	whether you agree with amended ISO rule – Section 301.2 <i>ISO Directives</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 301.2 <i>ISO Directives</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 301.2 ISO Directives

Empty response box for stakeholder comments.

Proposed Amended ISO rule – Section 304.2 *Electric Motor Start Requirements*

Period of Comment:	August 13, 2018	through	August 31, 2018	Contact:	Shanelle Sinclair
Comments From:	Market Surveillance Administrator			Phone:	403-705-3180
Date [yyyy/mm/dd]:	2018-08-22			Email:	shanelle.sinclair@albertamsa.ca

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
		Applicability	
		<p>Section 304.2 applies to:</p> <ul style="list-style-type: none"> (a) the operator of an industrial complex that has been identified by the ISO; (b) the operator of a transmission facility that has been identified by the ISO; and (c) the ISO. 	<p>General comment: The current appendix includes some enforcement conditions. If the Appendix is moved to an ID, it will not be enforceable.</p>
		ISO Identification	
2		The ISO must notify an operator of an industrial complex or transmission facility if they have been identified by the ISO as having to comply with this Section 304.2.	
		ISO Approval Prior to Starting an Electric Motor	

Section	Subsection	Proposed language	Stakeholder comments
3	(1)	The operator of an industrial complex must have the prior verbal approval of the ISO by means of direct access telephone to start an electric motor at the industrial complex, in accordance with the area-specific requirements established by the ISO in subsection 4(1).	
		Area-specific Requirements	
4	(1)	The ISO must publish on the AESO’s website any area-specific requirements applicable for starting an electric motor.	
4	(2)	The operator of an industrial complex or a transmission facility must comply with the area-specific requirements established by the ISO in subsection 4(1).	
4	(3)	The ISO must, if the requirements in subsections 3 and 4(2) have been met, approve the start of the electric motor unless the ISO has reliability concerns that would prevent the start of the electric motor.	

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 304.2 <i>Electric Motor Start Requirements</i> relates to the capacity market and why or why not	
2	whether you agree that amended ISO rule – Section 304.2 <i>Electric Motor Start Requirements</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 304.2 <i>Electric Motor Start Requirements</i> and whether, in your view, Section 304.2 <i>Electric Motor Start Requirements</i> meets the objective or purpose	
4	how, in your view, amended ISO rule – Section 304.2 <i>Electric Motor Start Requirements</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 304.2 <i>Electric Motor Start Requirements</i>	
6	whether you agree with amended ISO rule – Section 304.2 <i>Electric Motor Start Requirements</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 304.2 <i>Electric Motor Start Requirements</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 304.2 Electric Motor Start Requirements

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Section 304.8 Event Analysis



External Consultation Draft

August 3, 2018

Applicability

1 Section 304.8 applies to:

- (a) the **operator** of a **transmission facility**;
- (b) the **operator** of an **electric distribution system**;
- (c) the **operator** of a facility that provides **ancillary services**;
- (d) the **operator** of a **generating unit** that:
 - (i) is not part of an **aggregated generating facility**;
 - (ii) has a **maximum authorized real power** rating greater than 4.5 MW; and
 - (iii) is directly connected to the **transmission system** or to **transmission facilities** within the City of Medicine Hat, including a **generating unit** situated within an industrial complex that is directly connected to the **transmission system** or to **transmission facilities** within the City of Medicine Hat;
- (e) the **operator** of an **aggregated generating facility** that:
 - (i) has a **maximum authorized real power** rating greater than 4.5 MW; and
 - (ii) is directly connected to the **transmission system** or to **transmission facilities** within the City of Medicine Hat, including an **aggregated generating facility** situated within an industrial complex that is directly connected to the **transmission system** or to **transmission facilities** within the City of Medicine Hat;
- (f) the **legal owner** of a **transmission facility**;
- (g) the **legal owner** of an **electric distribution system**;
- (h) the **legal owner** of a facility that provides **ancillary services**;
- (i) the **legal owner** of a **generating unit** that:
 - (i) is not part of an **aggregated generating facility**;
 - (ii) has a **maximum authorized real power** rating greater than 4.5 MW; and
 - (iii) is directly connected to the **transmission system** or to **transmission facilities** within the City of Medicine Hat, including a **generating unit** situated within an industrial complex that is directly connected to the **transmission system** or to **transmission facilities** within the City of Medicine Hat;
- (j) the **legal owner** of an **aggregated generating facility** that:
 - (i) has a **maximum authorized real power** rating greater than 4.5 MW
 - (ii) is directly connected to the **transmission system** or to **transmission facilities** within the City of Medicine Hat, including an **aggregated generating facility** situated within an industrial complex that is directly connected to the **transmission system** or to **transmission facilities** within the City of Medicine Hat;

(collectively referred to as the "Responsible Entities")

and

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(k) the **ISO**.

Requirements

Requirements to Perform Event Analysis

- 2(1)** The **ISO** may conduct an event analysis of an event listed in Appendix 1.
- (2)** The **ISO** may conduct an event analysis for an event that is not listed in Appendix 1 where:
- (a) the **ISO** determines that an analysis is necessary to evaluate the impact of an event on the reliable operation of the **interconnected electric system**; or
 - (b) an event analysis report is requested by the **NERC** or the **WECC**.
- (3)** The **ISO** may categorize the event using the highest applicable category in Appendix 1 where Category 1 is the lowest and Category 5 is the highest.

Event Analysis Requests

3 The **ISO** may request a brief report or an event analysis report or both from a Responsible Entity while conducting an event analysis.

Responsible Entity Reporting

- 4(1)** A Responsible Entity must provide the **ISO** with a report requested in accordance with subsection 3:
- (a) in a manner specified by the **ISO**;
 - (b) within 10 **business days** if the **ISO** requests a brief report; and
 - (c) within 30 **business days** if the **ISO** requests an event analysis report.
- (2)** Notwithstanding subsection 4(1), a Responsible Entity may request, in writing, including all relevant supporting documentation, that the **ISO** provide an extension to the time frames indicated in subsections 4(1)(b) and 4(1)(c):
- (a) to allow for system restoration; or
 - (b) to allow the Responsible Entity to obtain accurate and complete information regarding the event.
- (3)** The **ISO** must respond, in writing, to an extension request made in accordance with subsection 4(2) within 3 **business days** of receiving the request.

Review

- 5(1)** Upon reviewing a brief report or event analysis report provided in accordance with subsection 4, the **ISO** may request that the Responsible Entity provide additional information as required to complete the event analysis within a specified time frame.
- (2)** A Responsible Entity must, upon receiving a request from the **ISO** under subsection 5(1) and within the time frame specified in the request:
- (a) provide the **ISO** with the requested information; or
 - (b) notify the **ISO**, in writing, of the reasons for which the requested information is not available or the specified time frame cannot be met.

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ISO Reporting

6(1) The **ISO** may, after reviewing the reports provided in accordance with subsection 4 and subsection 5, decide to author additional reports.

Event Analysis Recommendations

7(1) The **ISO** may, after completing a report under subsection 6, identify:

- (a) the Responsible Entity required to implement each recommendation in the report; and
- (b) an implementation date for each recommendation in the report.

(2) The **ISO** may:

- (a) provide a copy of a report issued under subsection 6 to each Responsible Entity identified under subsection 7(1); and
- (b) advise each Responsible Entity identified under subsection 7(1), in writing, of the implementation date for each recommendation applicable to that Responsible Entity.

(3) Subject to subsection 7(2), the **ISO** and each Responsible Entity identified under subsection 7(1) must treat a report provided under subsection 7(2)(a) as confidential.

(4) Each Responsible Entity identified under subsection 7(1) must implement each applicable recommendation by resolving the outstanding issues associated with each recommendation on or before the implementation date.

(5) Each Responsible Entity identified in subsection 7(1) must provide the **ISO** with:

- (a) notification that the recommendation has been implemented in accordance with subsection 7(4) within 5 **business days** following such implementation, or
- (b) a revised implementation date at least 5 **business days** before the implementation date identified by the **ISO** in subsection 7(2)(b), if the recommendation cannot be implemented in accordance with subsection 7(4).

Lessons Learned

8(1) The **ISO** may complete a *Lessons Learned* document which includes the following information:

- (a) high level details of the event;
- (b) corrective actions for possible future events; and
- (c) a list of lessons learned from the event.

(2) A *Lessons Learned* document must not contain any of the following information:

- (a) names of **electricity market participants**;
- (b) names of facilities;
- (c) the date on which the event occurred; and
- (d) to the extent practicable, any other information that would otherwise permit the identification of an **electricity market participant** or facilities.

(3) The **ISO** may publish the *Lessons Learned* document on the AESO website.

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Requirement to Report to the NERC and the WECC

9 The **ISO** may forward the reports and documents described in this section 304.8 to the **NERC** and the **WECC**.

Appendices

Appendix 1 – Event Categories

Revision History

Date	Description
XXXX-XX-XX	Revision to clarify "market participant" as "electricity market participant" Administrative amendments
2018-04-30	Initial release

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Appendix 1

Event Categories

Category 1: An event that results in one or more of the following:

- (a) An unexpected sustained outage caused by a common disturbance and contrary to design of any combination of three (3) or more **transmission facilities, aggregated generating facilities or generating units** with an aggregate generation of 500 MW to 1,999 MW at the time of the outage.
- (b) Failure or misoperation of a **remedial action scheme**.
- (c) A system wide voltage reduction of 3% or more that lasts more than fifteen (15) continuous minutes due to an emergency on the **interconnected electric system**.
- (d) Unintended separation within the **interconnected electric system** that results in an island of 100 MW to 999 MW. Excludes **transmission system** radial connections, and **electric distribution system** level islanding.
- (e) The loss of monitoring or control that significantly affects a Responsible Entity's ability to make operating decisions for thirty (30) continuous minutes or more, including:
 - (i) loss of **operator** ability to remotely monitor or control elements of the **bulk electric system, aggregated generating facilities or generating units** connected to the **bulk electric system**;
 - (ii) loss of communications from supervisory and data acquisition remote terminal units for a substation rated 69 kV and above;
 - (iii) unavailability of inter **control centre** protocol links reducing **bulk electric system** visibility
 - (iv) loss of the ability to remotely monitor and control **generating units** providing **regulating reserves**; or
 - (v) state estimator or contingency analysis failing to solve at a **control centre** for:
 - (A) the **ISO**; or
 - (B) the **operator** of a **transmission facility**.

Category 2: An event that results in one or more of the following:

- (a) Complete loss, for thirty (30) minutes or more, of all voice communication systems for a **control centre** including a **control centre** for:
 - (i) the **ISO**;
 - (ii) the **operator** of a **transmission facility** (that controls **transmission facilities** at two (2) or more locations); or
 - (iii) the **operator** of a **generating unit** (that controls **generating units** at two (2) or more locations).
- (b) Operating voltage excursions at the **point of connection** equal to or greater than 10% lasting more than fifteen (15) continuous minutes.
- (c) Unintended separation within the **interconnected electric system** that results in an island of 1,000 MW to 4,999 MW.

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- (d) Unintended loss of 300 MW or more of firm load for more than fifteen (15) minutes.
- (e) **Interconnection reliability operating limit T_v violation.**

Category 3: An event that results in one or more of the following:

- (a) Unintended loss of load or generation within the **interconnected electric system** of 2,000 MW to 5,000 MW.
- (b) Unintended separation within the **interconnected electric system** that results in an island of 5,000 to 10,000 MW. Excludes the loss of **interconnections**.

Category 4: An event that results in one or more of the following:

- (a) Unintended loss of load or generation within the **interconnected electric system** of 5,001 MW to 9,999 MW.
- (b) Unintended separation within the **interconnected electric system** that results in an island of more than 10,000 MW. Excludes the loss of **interconnections**.

Category 5: An event that results in one or more of the following:

- (a) Unintended loss of load within the **interconnected electric system** of 10,000 MW or more.
- (b) Unintended loss of generation within the **interconnected electric system** of 10,000 MW or more.

Proposed Amended ISO rule – Section 304.8 *Event Analysis*

Period of Comment:	August 13, 2018	through	August 31, 2018	Contact:	Shanelle Sinclair
Comments From:	Market Surveillance Administrator			Phone:	403-705-3180
Date [yyyy/mm/dd]:	2018-08-22			Email:	shanelle.sinclair@albertamsa.ca

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
		Applicability	
1		<p>Section 304.8 applies to:</p> <ul style="list-style-type: none"> (i) the legal owner of a generating unit that: <ul style="list-style-type: none"> (i) is not part of an aggregated generating facility; (ii) has a maximum authorized real power rating greater than 4.5 MW; and (iii) is directly connected to the transmission system or to transmission facilities within the City of Medicine Hat, including a generating unit situated within an industrial complex that is directly connected to the transmission system or to transmission facilities within the City of Medicine Hat; (j) the legal owner of an aggregated generating facility that: <ul style="list-style-type: none"> (i) has a maximum authorized real power rating greater than 4.5 MW 	<p>Note: the proposed language in the comment matrix does not match the language in the rule.</p> <p>However, our comment relates to indenting for definition of “Responsible Entities” at the bottom of section 1. It should be moved to the left to properly incorporate all entities rather than only the entities defined in subsection 1(j). See Redlined version.</p>

Section	Subsection	Proposed language	Stakeholder comments
		<p>(ii) is directly connected to the transmission system or to transmission facilities within the City of Medicine Hat, including an aggregated generating facility situated within an industrial complex that is directly connected to the transmission system or to transmission facilities within the City of Medicine Hat;</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 amended ISO rule – Section 304.8 <i>Event Analysis</i> relates to the capacity market and why or why not	
2	whether you agree that amended ISO rule – Section 304.8 <i>Event Analysis</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 304.8 <i>Event Analysis</i> and whether, in your view, Section 304.8 <i>Event Analysis</i> meets the objective or purpose	
4	how, in your view, amended ISO rule – Section 304.8 <i>Event Analysis</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 304.8 <i>Event Analysis</i>	
6	whether you agree with amended ISO rule –Section 304.8 <i>Event Analysis</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 304.8 <i>Event Analysis</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 304.8 Event Analysis

Proposed Amended ISO rule – Section 305.1 *Energy Emergency Alerts*

Period of Comment:	August 13, 2018	through	August 31, 2018	Contact:	Shanelle Sinclair
Comments From:	Market Surveillance Administrator			Phone:	403-705-3180
Date [yyyy/mm/dd]:	2018-08-22			Email:	shanelle.sinclair@albertamsa.ca

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
		Issuing Energy Emergency Alerts	
2	(1)	The ISO must, during a supply shortfall event, declare an energy emergency alert.	<u>General comment: Ensure that the definition of EEA1, EEA2 and EEA3, as well as communication requirements are included in the new Alberta Reliability Standard (EOP-011).</u>
2	(2)	The ISO must, when a supply shortfall event ends, cancel the energy emergency alert -0 .	<u>Minor nit.</u>

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 305.1 <i>Energy Emergency Alerts</i> relates to the capacity market and why or why not	
2	whether you agree that amended ISO rule – Section 305.1 <i>Energy Emergency Alerts</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 305.1 <i>Energy Emergency Alerts</i> and whether, in your view, Section 305.1 <i>Energy Emergency Alerts</i> meets the objective or purpose	
4	how, in your view, amended ISO rule – Section 305.1 <i>Energy Emergency Alerts</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 305.1 <i>Energy Emergency Alerts</i>	
6	whether you agree with amended ISO rule – Section 305.1 <i>Energy Emergency Alerts</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 305.1 <i>Energy Emergency Alerts</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 305.1 Energy Emergency Alerts

Stakeholder Comment Matrix – August 13, 2018



Proposed Amended ISO rules: *Section 305.4 System Security;*
Section 501.10 Transmission Loss Factors
Section 502.9 Synchrophasor Measurement Unit Technical Requirements
Section 507.1 Open Access Requirement for Proposed Interties

Period of Comment: August 13, 2018 through August 31, 2018

Contact: Shanelle Sinclair

Comments From: Market Surveillance Administrator

Phone: 403-705-3180

Date [yyyy/mm/dd]: 2018-08-22

Email: shanelle.sinclair@albertamsa.ca

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"> i. Section 305.4 System Security ii. Section 501.10 Transmission Loss Factors iii. Section 502.9 Synchrophasor Measurement Unit Technical Requirements iv. Section 507.1 Open Access Requirement for Proposed Interties <p>with regard to the following matters:</p>	
<p>1. Do you agree or disagree with the proposed amended ISO rules - Section 305.4 <i>System Security</i>, Section 501.10 <i>Transmission Loss Factors</i>, Section 502.9 <i>Synchrophasor Measurement Unit Technical Requirements</i>, and Section 507.1 <i>Open Access Requirement for Proposed Interties</i>? If you disagree, please provide comments.</p>	

Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
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.	
3. Do you have any additional comments?	<ul style="list-style-type: none"> • General style comments: <ul style="list-style-type: none"> ○ Rule 501.10 – in all other rules, spelt out numbers were removed and replaced only with the numerical value (ex. one(1)). However, this was not done in Section 501.10. ○ Inconsistent style choice of hyphenated words. For example in Section 206.2 the word “Self-supply” is capitalized before the hyphen but not capitalized afterwards. However, in Section 502.9 the word “As-Build” is capitalized before and after the hyphen.

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 rules - Section 305.4 <i>System Security</i> , Section 501.10 <i>Transmission Loss Factors</i> , Section 502.9 <i>Synchrophasor Measurement Unit Technical Requirements</i> , and Section 507.1 <i>Open Access Requirement for Proposed Interties</i> relates to the capacity market and why or why not	
2	whether you agree that amended ISO rules – Section 305.4 <i>System Security</i> , Section 501.10 <i>Transmission Loss Factors</i> , Section 502.9 <i>Synchrophasor Measurement Unit Technical Requirements</i> , and Section 507.1 <i>Open Access Requirement for Proposed Interties</i> should [or should not] be in effect for a fixed term and why or why not	

Item #		Stakeholder comments
3	<p>whether you understand and agree with the objective or purpose of amended ISO rule – Section 305.4 <i>System Security</i>, Section 501.10 <i>Transmission Loss Factors</i>, Section 502.9 <i>Synchrophasor Measurement Unit Technical Requirements</i>, and Section 507.1 <i>Open Access Requirement for Proposed Interties</i> and whether, in your view, these amended ISO rules meets the objective or purpose</p>	
4	<p>how, in your view, amended ISO rule – Section 305.4 <i>System Security</i>, Section 501.10 <i>Transmission Loss Factors</i>, Section 502.9 <i>Synchrophasor Measurement Unit Technical Requirements</i>, and Section 507.1 <i>Open Access Requirement for Proposed Interties</i> affects the performance of the capacity market and the electricity market</p>	
5	<p>your views on any analysis conducted or commissioned by the AESO supporting amended ISO rule – Section 305.4 <i>System Security</i>, Section 501.10 <i>Transmission Loss Factors</i>, Section 502.9 <i>Synchrophasor Measurement Unit Technical Requirements</i>, and Section 507.1 <i>Open Access Requirement for Proposed Interties</i></p>	
6	<p>whether you agree with amended ISO rule – Section 305.4 <i>System Security</i>, Section 501.10 <i>Transmission Loss Factors</i>, Section 502.9 <i>Synchrophasor Measurement Unit Technical Requirements</i>, and Section 507.1 <i>Open Access Requirement for Proposed Interties</i> 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	whether you would suggest any alternatives to amended ISO rule – Section 305.4 <i>System Security</i> , Section 501.10 <i>Transmission Loss Factors</i> , Section 502.9 <i>Synchrophasor Measurement Unit Technical Requirements</i> , and Section 507.1 <i>Open Access Requirement for Proposed Inerties</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 information documents associated with amended ISO rules – Section 305.4 System Security, Section 501.10 Transmission Loss Factors, Section 502.9 Synchrophasor Measurement Unit Technical Requirements, or Section 507.1 Open Access Requirement for Proposed Inerties