

Proposed New ISO rule – Section 103.11, *Capacity Market Financial Security Requirements*

Period of Comment:	September 7, 2018	through	September 28, 2018	Contact:	Rochelle Pancoast
Comments From:	City of Medicine Hat			Phone:	403-529-8288
Date [yyyy/mm/dd]:	2018/09/28			Email:	rocpan@medicinehat.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 103.11 applies to: (a) a capacity market participant ; and (b) the ISO .	
		Requirements Provision of Financial Security	
2		A capacity market participant must provide to the ISO , or cause its guarantor to provide to the ISO , any financial security which it is required to provide, or requested by the ISO to provide, pursuant to this section 103.11.	
		Financial Security – Payment Adjustment Balance Limit	
3	(1)	The ISO may, if, at any time prior to or during an obligation period , the ISO is of the opinion that the payment adjustment balance, as determined in accordance with Section 103.9 of the ISO rules , <i>Capacity Market Financial Settlement</i> , in respect of any asset, may, at any time, exceed a limit calculated as follows: $PAB\ limit = \text{the capacity payment, calculated in accordance with Section 103.10 of}$	

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		<p style="text-align: center;">the ISO rules, <i>Capacity Payment Calculation</i> for such obligation period * 12 *1.3</p> <p>calculate an adjustment to the amount of financial security which the capacity market participant may be required to provide to the ISO in respect of such obligation period as follows:</p> <p style="padding-left: 40px;"><i>adjusted security requirement</i> = security requirement less the total amount of financial security currently held by the ISO in respect of such asset pursuant to this subsection 3(1)</p> <p style="padding-left: 40px;">where:</p> <p style="padding-left: 40px;"><i>security requirement</i> = the greater of:</p> <p style="padding-left: 80px;">(i) the estimated payment adjustment balance less the <i>PAB limit</i>; and</p> <p style="padding-left: 80px;">(ii) \$0.</p>	
3	(2)	<p>The ISO may, if the amount of the adjusted security requirement determined pursuant to subsection 3(1) is a positive number, request the applicable capacity market participant to provide financial security to the ISO in the amount of the adjusted security requirement on or prior to the date specified in any notice to the capacity market participant from the ISO, which date shall in all events be not less than 5 business days following the delivery of such notice.</p>	
		<p>Financial Security – Change to Capacity Payment</p>	
4	(1)	<p>The ISO may, if there is any estimated change in the amount of the capacity payment, calculated in accordance with Section 103.10 of the ISO rules, <i>Capacity Payment Calculation</i> for an asset for any obligation period, calculate and must calculate upon any request of the applicable capacity market participant an adjustment to the amount of financial security which the capacity market participant may be required to provide to the ISO in respect of such obligation period as follows:</p> <p style="padding-left: 40px;"><i>adjusted security requirement</i> = security requirement less the total amount of financial security currently held by the ISO in respect of such asset pursuant to this subsection 4(1)</p> <p style="padding-left: 40px;">where:</p>	

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		<p style="text-align: center;"><i>security requirement</i> = the greater of:</p> <p style="text-align: center;">(i) the estimated payment adjustment balance less the PAB limit; and</p> <p style="text-align: center;">(ii) \$0; and</p> <p style="text-align: center;"><i>PAB limit</i> = the capacity payment, calculated in accordance with Section 103.10 of the ISO rules, Capacity Payment Calculation for such obligation period (which shall be \$0 if such asset is not subject to a capacity commitment for such obligation period) * 12 * 1.3.</p>	
4	(2)	<p>The ISO may, if the amount of the adjusted security requirement determined pursuant to subsection 4(1) is a positive number, request the applicable capacity market participant to provide financial security to the ISO in the amount of the adjusted security requirement on or prior to the date specified in any notice to the capacity market participant from the ISO, which date shall in all events be not less than 5 business days following the delivery of such notice.</p>	
4	(3)	<p>The ISO may, if requested by the capacity market participant, if the amount of the adjusted security requirement determined pursuant to subsection 4(1) in respect of an obligation period is a negative number, reduce the amount of financial security of the capacity market participant as of the commencement of such obligation period by the adjusted security requirement.</p>	
		<p style="text-align: center;">Financial Security – New Capacity, Refurbished Capacity, and Incremental Capacity</p>	
5	(1)	<p>A capacity market participant must, prior to participating in a base auction or rebalancing auction and within the timelines prescribed in the <i>Capacity Market Auction Guidelines</i>, provide financial security to the ISO for the security requirement amounts determined pursuant to this subsection 5 and subsection 6, as applicable, in respect of an asset with:</p> <ul style="list-style-type: none"> (a) new capacity; (b) refurbished capacity, or (c) incremental capacity, <p>that is not energized and commissioned at the time of the base auction or rebalancing auction.</p>	<p>City of Medicine (CMH) requests clarity on security payment for behind the fence increases in capacity. It appears as though new capacity within CMH limits would be treated as incremental capacity given that it would increase the capacity of a single existing asset in terms of capacity market participation. Please confirm.</p> <p>CMH also requests clarity of intent. Is the intent to provide governance around physical changes in gross capacity, or for Self-Supply participants like CMH, is the focus more around changes to UCV with net to grid impacts? For instance it is possible for CMH UCV changes simply through load destruction. Alternatively, new load could energize</p>

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			<p>coincidentally with new physical capacity within CMH for little to no change in UCV net to grid values.</p> <p>In addition, is the intent of the Rule that CMH would be required to post security for any generation asset being developed within its territory (such as by a third party) if that asset is expected to have a positive UCV? For clarity, is CMH responsible for meeting the security requirements of any incremental capacity within its territory?</p>
5	(2)	<p>The ISO must calculate the security requirement for the volume of uniform capacity value from an asset with new capacity that a capacity market participant must offer in a base auction or rebalancing auction as follows:</p> $\text{security requirement} = (\text{gross-CONE} * 1 / \text{CRF}) * 5\% * \text{uniform capacity value}$ <p>where gross-CONE is from the demand curve for the applicable base auction or rebalancing auction as established in accordance with Section 207.3 of the ISO rules, Shape of Demand Curve;</p> <p>CRF is the capital recovery factor specified in subsection 5(3); and</p> <p>uniform capacity value is the volume of uniform capacity value the capacity market participant must offer for the applicable base auction or rebalancing auction.</p>	
5	(3)	<p>The ISO must calculate the capital recovery factor as:</p> $\text{CRF} = \{i(1 + i)^n\} / \{(1 + i)^n - 1\}$ <p>where i is the discount rate used in the gross-CONE determination as per Section 207.3 of the ISO rules, Shape of Demand Curve; and</p> <p>n is a 20 year plant life.</p>	
5	(4)	<p>The ISO must calculate the security requirement for the volume of uniform capacity value from an asset with refurbished capacity that a capacity market participant must offer in a base auction or rebalancing auction as follows:</p>	

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		<p><i>security requirement = unit rate * escalation rate * 5% * uniform capacity value</i></p> <p>where the unit rate is \$200/kW;</p> <p>escalation rate is the current capital cost escalation rate as determined by the ISO;</p> <p>and</p> <p>uniform capacity value is the volume of uniform capacity value the capacity market participant must offer for the applicable base auction or rebalancing auction.</p>	
5	(5)	<p>The ISO must calculate the security requirement for the volume of uniform capacity value from incremental capacity that a capacity market participant must offer in a base auction or rebalancing auction as follows:</p> <p><i>security requirement = unit rate * escalation rate * 5% * uniform capacity value</i></p> <p>where the unit rate is \$100/kW;</p> <p>escalation rate is the current capital cost escalation rate as determined by the ISO;</p> <p>and</p> <p>uniform capacity value is the volume of uniform capacity value from incremental capacity the capacity market participant must offer for the applicable base auction or rebalancing auction.</p>	
		<p>Financial Security – Revised Amounts</p>	
6	(1)	<p>The ISO must, following a base auction or a rebalancing auction, determine the security requirement of an asset identified in subsection 5(1) as follows:</p> <ul style="list-style-type: none"> (a) \$0, if the capacity market participant elected to delist the entire volume of new capacity or refurbished capacity for the asset in accordance with Section 206.1 of the ISO rules, <i>Qualification of Capacity</i>; (b) \$0, if the capacity market participant elected to not continue with the retrofit for incremental capacity for the asset in accordance with Section 206.1 of the ISO rules, <i>Qualification of Capacity</i>; (c) \$0, if the capacity market participant failed to receive a capacity 	

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		<p>commitment for that asset for the applicable obligation period;</p> <p>(d) \$0, if such rebalancing auction is the last rebalancing auction for the applicable obligation period and that asset achieved energization and commissioning;</p> <p>(e) the amount determined in accordance to subsection 5, if the capacity market participant received a capacity commitment for that asset for the applicable obligation period; or</p> <p>(f) the amount determined in accordance with subsection 6(2), if applicable.</p>	
6	(2)	<p>The ISO must, if an asset was determined to meet its critical milestones as per Section 206.5 of the ISO rules, <i>Forward Period Milestone Assessment</i> in advance of a rebalancing auction, calculate the security requirement for the capacity commitment which was the outcome of an offer of new capacity, refurbished capacity or incremental capacity that cleared a prior base auction or rebalancing auction for the applicable obligation period, as follows:</p> $\text{security requirement} = \text{security rate} * \text{capacity commitment} * \max\{\text{remaining auctions}, 1\} / \text{total applicable auctions}$ <p>where:</p> <ul style="list-style-type: none"> security rate is calculated as per subsection 6(3), as applicable; capacity commitment is the capacity commitment of the asset for the obligation period in respect of such rebalancing auction; total applicable auctions is the count of all base auctions and rebalancing auctions, regardless of the respective obligation period, from the base auction or rebalancing auction which the initial security requirement was provided pursuant to subsection 5, to the start of the obligation period which the initial security requirement was provided in respect of; and remaining auctions is the count of all base auctions and rebalancing auctions, regardless of the respective obligation period, from this rebalancing auction which the reduced security requirement is being calculated and provided for, to the start of the obligation period which the reduced security requirement is being calculated and provided in respect of. 	

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6	(3)	<p>The ISO must calculate the security rate as follows:</p> <p>(a) for an asset with a capacity commitment based on new capacity: $security\ rate = (gross-CONE * 1 / CRF) * 5\%$ where gross-CONE is from the demand curve for the applicable base auction or rebalancing auction as established in accordance with Section 207.3 of the ISO rules, Shape of Demand Curve; and CRF is the capital recovery factor specified in subsection 5(3);</p> <p>(b) for an asset with a capacity commitment based on refurbished capacity: $security\ rate = unit\ rate * escalation\ rate * 5\%$ where the unit rate is \$200/kW; and escalation rate is the current capital cost escalation rate as determined by the ISO; or</p> <p>(c) for an asset with a capacity commitment based on incremental capacity: $security\ rate = unit\ rate * escalation\ rate * 5\%$ where the unit rate is \$100/kW; and escalation rate is the current capital cost escalation rate as determined by the ISO.</p>	
6	(4)	<p>The ISO may, following a rebalancing auction, adjust the amount of financial security a capacity market participant must provide to the ISO for an asset in accordance with the amount determined in subsection 6.</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 103.11 <i>Capacity Market Financial Security</i> relates to the capacity market and why or why not	
2	whether you agree that the proposed new ISO Rule – Section 103.11 <i>Capacity Market Financial Security</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 103.11 <i>Capacity Market Financial Security</i> and whether, in your view, the proposed new ISO Rule – Section 103.11 <i>Capacity Market Financial Security</i> meets the objective or purpose	
4	how, in your view, the proposed new ISO Rule – Section 103.11 <i>Capacity Market Financial Security</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 103.11 <i>Capacity Market Financial Security</i>	
6	whether you agree with the proposed new ISO Rule – Section 103.11 <i>Capacity Market Financial Security</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 103.11 <i>Capacity Market Financial Security</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 103.11 Capacity Market Financial Security.

Proposed New ISO rule – Section 201.15, *Delisting*

Period of Comment:	September 7, 2018	through	September 28, 2018	Contact:	Rochelle Pancoast
Comments From:	City of Medicine Hat			Phone:	403-529-8288
Date [yyyy/mm/dd]:	2018/09/28			Email:	rocpan@medicinehat.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 201.15 applies to: <ul style="list-style-type: none"> (a) a capacity market participant; (b) a pool participant; (c) the legal owner of a generating unit or aggregated generating facility where such generating unit or aggregated generating facility is the subject of a permanent delist notification; and (d) the ISO. 	
		Requirements Request to Temporarily Delist for Economic Reasons	
2	(1)	A capacity market participant may, within the timelines specified in the <i>Capacity Market Auction Guidelines</i> for the last rebalancing auction and in the manner the ISO specifies, submit to the ISO a request to temporarily delist an asset for the obligation period for economic reasons.	
2	(2)	A capacity market participant must, in the request referred to in subsection 2(1), submit:	City of Medicine Hat (CMH) submits that the AESO requirements and limitations are far

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		<p>(a) an attestation from a corporate officer of the pool participant:</p> <p>(i) that the pool participant confirms that if the request is approved by the ISO, the delist outage in the energy market in the obligation period will total greater than 210 days such that participation in the energy market is for a continuous period of 155 days or less;</p> <p>(ii) the MW volume of the asset that will be subject to a delist outage in the energy market;</p> <p>(iii) the start date and the end date of the delist outage referred to in 2(2)(b)(i);</p> <p>(b) the avoidable costs associated with the delist outage referred to in subsection 2(2)(a);</p> <p>(c) any information necessary for the ISO to calculate the energy and ancillary services offset in accordance with subsection 3(2).</p> <p>(d) an attestation from a corporate officer of the legal owner of the asset that the avoidable costs and information referred to in subsections 2(2)(b) and 2(2)(c), respectively, are accurate; and</p> <p>(e) any other information the ISO specifies as it relates to the request to temporarily delist an asset for economic reasons.</p>	<p>too prescriptive for use with respect to the CMH. CMH has a range of resources within its territory and has a mandate to supply power to customers within its service territory. Its primary mandate is not participation in the AESO capacity and energy markets.</p> <p>As such, it is not reasonable to restrict the CMH's ability to manage its physical assets in the best interests of its internal customers.</p> <p>CMH submits that the rule should allow restatements to UCV rather than prescribing limits to how CMH manages its fleet. If the rule is intended to read this way, i.e. outages of facilities within CMH territory can be managed by restating the capacity of the overall CMH export asset, it is acceptable. However, it is not reasonable to restrict the ability of the CMH to temporarily mothball a plant within its territory as part of minimizing its costs. This applies to reductions in UCV for both economic and operational reasons.</p> <p>For example, if the CMH mothballs a facility that is not currently required for n-1 load coverage but chooses not to decommission as a hedge to manage potential for unexpected load growth, the AESO should not restrict this ability.</p>
		<p>ISO Review and Approval of Request to Temporarily Delist for Economic Reasons</p>	
3	(1)	<p>The ISO may exclude all or a portion of the avoidable costs submitted pursuant to subsection 2(2)(b) where such costs, in the ISO's determination, are unreasonable.</p>	
3	(2)	<p>The ISO must calculate the energy and ancillary services offset, as applicable, for the asset during the obligation period using the methodology set out in Section 206.11 of ISO rules, Energy and Ancillary Services Offset for Assets.</p>	
3	(3)	<p>The ISO may, where the ISO determines that the energy associated with the outage referred to in subsection 2(2)(a) is not necessary to maintain reliability during the obligation period, approve a request to temporarily delist for economic reasons.</p>	
3	(4)	<p>The ISO must, if it approves a request pursuant to subsection 3(3), provide the capacity market participant, within the timelines specified in the <i>Capacity Market Auction</i></p>	

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		<p><i>Guidelines</i> for the last rebalancing auction, with a price based on the remaining avoidable costs submitted in accordance with subsection 2(2)(b) that have not been excluded in accordance with subsection 3(3), net of the energy and ancillary services offset.</p>	
		<p>Submission of Offer Price for Temporary Economic Delist</p>	
4		<p>Notwithstanding Section 206.4 of the ISO rules, <i>Offers and Bids for the Capacity Market</i>, a capacity market participant that has been provided a price in accordance with subsection 3(4) must submit an offer comprised of one capacity block at the price specified in subsection 3(4) in the last rebalancing auction for the MW volume set out in subsection 2(2)(a)(ii).</p>	
		<p>Request to Temporarily Delist due to Physical or Operational Limitations</p>	
5	(1)	<p>A capacity market participant must, within the timelines specified in the <i>Capacity Market Auction Guidelines</i> and in the manner the ISO specifies, submit to the ISO a request to temporarily delist an asset from the capacity market for the obligation period if the asset will be subject to a derate or an outage for a period greater than or equal to 150 continuous days in the obligation period due to a physical operational limitation of the asset of the capacity market participant.</p>	
5	(2)	<p>A capacity market participant must, subject to subsection 5(3), submit the following information to the ISO in the request referred to in subsection 5(1):</p> <ul style="list-style-type: none"> (a) a description of the physical or operational limitation; (b) a description of any major repairs required to rectify the physical or operational limitation; and (c) if applicable, an order, decision, final rule, opinion or final directive from a regulatory authority specifically mandating the derating of the asset. 	
5	(3)	<p>A capacity market participant must, in the case of an asset with new capacity, refurbished capacity or incremental capacity, submit to the ISO in the request referred to in subsection 5(1) an attestation from a corporate officer of the capacity market participant certifying that the new capacity, refurbished capacity or incremental capacity will not be in full commercial operation prior to the obligation period.</p>	

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5	(4)	<p>A capacity market participant must, in the request referred to in subsection 5(1), submit:</p> <p>(a) an attestation from a corporate officer of the pool participant:</p> <ul style="list-style-type: none"> (i) that the pool participant confirms that if the request is approved by the ISO, the delist outage in the energy market will be for a continuous period in the obligation period which must be greater than 150 days; (ii) the MW volume of the asset that will be subject to a delist outage in the energy market; (iii) a description of the physical or operational limitation of the asset; and <p>(iv) the start date and the end date of the delist outage referred to in 5(2)(c)(i); and</p> <p>(b) any other information the ISO specifies as it relates to the request to temporarily delist the asset.</p>	
		<p>ISO Approval of Request to Temporarily Delist due to a Physical or Operational Limitation</p>	
6	(1)	<p>The ISO must approve a request to temporarily delist an asset due to a physical or operational limitation if:</p> <ul style="list-style-type: none"> (a) the ISO is satisfied that the request referred to in subsection 5(1) is complete; and (b) the delist outage referred in subsection 5(2)(a) is greater than 150 continuous days in the obligation period. 	
6	(2)	<p>Notwithstanding subsection 6(1), the ISO may not approve a request to temporarily delist an asset if, in the ISO's determination, the volume of capacity is necessary to maintain reliability.</p>	
		<p>Delist Outage</p>	
7	(1)	<p>A pool participant must, if the offer referred to in subsection 4(1) does not clear in the last rebalancing auction, submit a delist outage that corresponds to the outage declared in accordance with subsection 2(2)(a).</p>	

Section	Subsection	Proposed language	Stakeholder comments
7	(2)	A pool participant must, if the ISO approves a request pursuant to subsection 6, submit a delist outage that corresponds to the outage declared in accordance with subsection 5(2)(a).	
		Request to Change Delist Outage	
8	(1)	A pool participant must submit a request to the ISO to change the delist outage submitted in accordance with subsection 7(2) in the manner the ISO specifies.	
8	(2)	The ISO may approve a request submitted under subsection 8(1) if the ISO determines that the change to the delist outage has no material impact to reliability , unless such request reduces the delist outage to less 150 days .	
		Restriction on Ability to Temporarily Delist	
9		A capacity market participant must not temporarily delist an asset for more than two consecutive obligation periods .	
		Permanent Delist Notification	
11	(1)	A capacity market participant may, in accordance with the timelines established in the <i>Capacity Market Auction Guidelines</i> for the base auction or the first rebalancing auction for an obligation period , and in the manner the ISO specifies, submit to the ISO a notification to permanently delist an asset.	
11	(2)	A capacity market participant must, in the notification referred to in subsection 11(1), submit: <ul style="list-style-type: none"> (a) the MW volume from the asset that the capacity market participant is permanently delisting; and (b) in the case of a generating unit, aggregated generating facility or energy storage facility: <ul style="list-style-type: none"> (i) an attestation from a corporate officer of the pool participant: <ul style="list-style-type: none"> (A) that the pool participant confirms that the MW volume referred to in subsection 11(2)(a) will be removed from the energy market on or before the first day of 	

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		June in the obligation period ; and (B) the date that the MW volume from the asset will be removed from the energy market. (ii) an attestation from a corporate officer of the legal owner : (A) that the legal owner confirms that the MW volume referred to in subsection 11(2)(a) will be removed from the energy market on or before the first day of June in the obligation period ; and (B) the date that the MW volume from the asset will be removed from the energy market.	
11	(3)	A capacity market participant may not revoke a notification to permanently delist after it has been submitted to the ISO in accordance with subsections 11(1) and 11(2).	
11	(4)	The ISO must implement the removal of the MW volume from an asset referred to in subsection 11(2) from the energy market.	

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 201.15, <i>Delisting</i> relates to the capacity market and why or why not	
2	whether you agree that the proposed new ISO Rule – Section 201.15, <i>Delisting</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 201.15, <i>Delisting</i> and whether, in your view, the proposed new ISO Rule – Section 201.15, <i>Delisting</i> meets the objective or purpose	
4	how, in your view, the proposed new ISO Rule – Section 201.15, <i>Delisting</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 201.15, <i>Delisting</i>	
6	whether you agree with the proposed new ISO Rule – Section 201.15, <i>Delisting</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 201.15, <i>Delisting</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 201.15, Delisting.

Proposed Amended ISO rule – Section 206.1, Qualification of Capacity

Period of Comment:	September 7, 2018	through	September 28, 2018	Contact:	Rochelle Pancoast
Comments From:	City of Medicine Hat			Phone:	403-529-8288
Date [yyyy/mm/dd]:	2018/09/28			Email:	rocpan@medicinehat.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
		Declaration for New Capacity	
3		<p>A person must, within the timelines prescribed by the <i>Capacity Market Auction Guidelines</i> and in the manner the ISO specifies, submit to the ISO an attestation from a corporate officer as to whether an asset with the new capacity will:</p> <ul style="list-style-type: none"> (a) permanently delist in accordance with Section 201.15, <i>Delisting</i>; or (b) continue to participate in the energy and capacity markets, <p>in the event that the capacity market participant fails to receive a capacity commitment for such asset in the base auction or rebalancing auction.</p>	
		Declarations for Incremental Capacity and Refurbished Capacity	
4	(1)	<p>A capacity market participant must, if it has applied to provide proposed incremental capacity, submit to the ISO, within the timelines prescribed by the <i>Capacity Market Auction Guidelines</i> and in the manner the ISO specifies, an attestation from a corporate officer as to whether the anticipated maximum capability of the asset with 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 	

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		<p>(b) remain as the anticipated maximum capability accounting for the proposed incremental capacity,</p> <p>in the event that the 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>	
4	(2)	<p>A capacity market participant must, within the timelines prescribed by the <i>Capacity Market Auction Guidelines</i> and in the manner the ISO specifies, submit to the ISO an attestation from a corporate officer as to whether an asset with refurbished capacity will:</p> <p>(a) permanently delist in accordance with Section 201.15 of the ISO rules, <i>Delisting</i>; or</p> <p>(b) continue to participate in the energy market and capacity market,</p> <p>in the event that the capacity market participant fails to receive a capacity commitment for such asset in the base auction or rebalancing auction.</p>	
		<p>Declaration for Load Asset</p>	
5	(1)	<p>A person must, within the timelines prescribed by the <i>Capacity Market Auction Guidelines</i> and in the manner the ISO specifies, declare to the ISO a firm consumption level if the person is seeking to have the ISO qualify a load asset providing a firm consumption level for the capacity market.</p>	
5	(2)	<p>A person must, within the timelines prescribed by the <i>Capacity Market Auction Guidelines</i> and in the manner the ISO specifies, declare to the ISO a guaranteed load reduction if the person is seeking to have the ISO qualify a load asset providing a guaranteed load reduction for the capacity market.</p>	
		<p>Declaration for Import Asset</p>	
6		<p>A person must, within the timelines prescribed by the <i>Capacity Market Auction Guidelines</i> and in the manner the ISO specifies, declare to the ISO a volume in MW from an import asset, which is less than or equal to the amount of firm transmission, that the person is seeking to have the ISO qualify for the capacity market.</p>	

Section	Subsection	Proposed language	Stakeholder comments
		<p>Qualification of New Capacity, Incremental Capacity and Refurbished Capacity</p>	
7	(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: <ul style="list-style-type: none"> (i) developed in accordance with a project plan and timeline that aligns with the critical milestones established by the ISO; and (ii) energized and commissioned prior to the obligation period. (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; and (ii) is or will be a retail or self-retail asset; (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: <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 	<p>7(1)(i)(iii) raises a concern for the City of Medicine Hat (CMH) in that it will likely have a wide range of asset types behind its fence and is in effect an aggregator. For example, does this rule preclude the CMH from using demand response behind its fence as part of its capacity market participation? How does storage fit within the rule if it is behind CMH fence? CMH submits that the AESO should not dictate how capacity is developed within City territory but rather should evaluate that capacity and whether it meets its obligations on a net to grid UCV basis. The rule as structured is extremely prescriptive and limits CMH's ability to undertake unique and innovative projects.</p> <p>In terms of energy efficiency, can CMH reduce its load via energy efficiency projects thereby increasing net to grid capability? It does not seem reasonable to restrict CMH's ability to initiate an energy efficiency project that would increase expected net to grid capability and not count that increase in capacity.</p>

Section	Subsection	Proposed language	Stakeholder comments
		<p>(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.</p> <p>(i) in the case of an aggregation of assets:</p> <p>(i) has a uniform capacity value less than or equal to the maximum capability of the largest generating unit in Alberta multiplied by 0.85;</p> <p>(ii) has or will have the appropriate metering the ISO specifies for each asset in the aggregation;</p> <p>(iii) is comprised of assets that are either exclusively:</p> <p>(A) generating units or aggregated generating facilities located within Alberta;</p> <p>(B) load assets providing a firm consumption level located within Alberta; or</p> <p>(C) load assets providing a guaranteed load reduction located within Alberta;</p> <p>and,</p> <p>(iv) is not comprised of any asset that will contribute capacity individually, or as part of another aggregation, to the capacity market;</p> <p>(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:</p> <p>(i) greater than or equal to 1 MW; and</p> <p>(ii) less than or equal to the greater of:</p> <p>(A) 15% of the asset's maximum capability; or</p> <p>(B) 40 MW above the asset's maximum capability.</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>	

Section	Subsection	Proposed language	Stakeholder comments
		<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 (B) 40 MW above the asset's maximum capability; or (ii) a capital investment of greater than or equal to \$200 per kW of the asset's current maximum capability multiplied by a capital cost escalation rate that is specified by the ISO. 	

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 – <i>Section 206.1, Qualification of Capacity</i> relates to the capacity market and why or why not	
2	whether you agree that amended ISO rule – <i>Section 206.1, 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 amended ISO rule – <i>Section 206.1, Qualification of Capacity</i> and whether, in your view, <i>Section 206.1, Qualification of Capacity</i> meets the objective or purpose	
4	how, in your view, amended ISO rule – <i>Section 206.1, 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 amended ISO rule – <i>Section 206.1, Qualification of Capacity</i>	
6	whether you agree with amended ISO rule – <i>Section 206.1, 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 amended ISO rule – <i>Section 206.1, 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 amended ISO rule – Section 206.1, Qualification of Capacity.

Proposed Amended ISO rule – Section 206.2, Self-Supply

Period of Comment:	September 7, 2018	through	September 28, 2018	Contact:	Rochelle Pancoast
Comments From:	City of Medicine Hat			Phone:	403-529-8288
Date [yyyy/mm/dd]:	2018/09/28			Email:	rocpan@medicinehat.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		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, excluding sites where the load is exclusively station service for the generating unit or aggregated generating facility; (b) the legal owner of a generating unit or an aggregated generating facility that self-supplies capacity for one or more onsite load assets; (c) the City of Medicine Hat; and (d) the ISO. 	City of Medicine Hat agrees that it is a self-supply configuration.
		Requirements Requirements to Self-supply Capacity	
2	(1)	The legal owner of a load asset must self-supply capacity if such site is: <ul style="list-style-type: none"> (a) metered in a manner that the metering measures both onsite generation and load as a single value for each metering interval; or 	

Section	Subsection	Proposed language	Stakeholder comments
		(b) is not capable of flowing all energy produced on the site on to the interconnected electric system .	
2	(2)	The City of Medicine Hat must self-supply capacity .	
		Application to Self-supply Capacity	
3		The legal owner of a load asset 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.	It is unclear why an application must be submitted when City of Medicine Hat must self-supply.
		Approval to Self-supply Capacity	
4		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 subsection 2.	
		Changes in Self-supply Configuration	
5		The legal owner of a load asset that is self-supplying capacity pursuant to subsection 2(1) must self-supply capacity for a minimum of 4 obligation periods unless it can demonstrate to the ISO 's satisfaction that physical changes to the site warrant a change in self-supply configuration.	

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

Proposed New ISO rule – Section 206.3, *Uniform Capacity Value Determination*

Period of Comment:	September 7, 2018	through	September 28, 2018	Contact:	Rochelle Pancoast
Comments From:	City of Medicine Hat			Phone:	403-529-8288
Date [yyyy/mm/dd]:	2018/09/28			Email:	rocpan@medicinehat.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 206.3 applies to: (a) a capacity market participant ; and (b) the ISO .	
		Requirements 1250 Tightest Supply Cushion Hours	
2		The ISO must select 250 hours from each 12 month consecutive period in the historical 60 month evaluation period as follows: (a) calculate the supply cushion for every hour; (b) rank all hours based on supply cushion in ascending order; (c) within the order referred to in subsection 2(b), rank hours with equivalent supply cushion in ascending order from the most recent to the most distant of time; and (d) select the first 250 hours after ranking in accordance with subsection 2(b) and 2(c).	

Section	Subsection	Proposed language	Stakeholder comments
		<p>Asset Specific Hours for Uniform Capacity Value Calculation</p>	
3	(1)	<p>The ISO must remove the following hours from the 1250 hours identified in subsection 2 on an asset-specific basis, in order to create an historical data set for each asset listed for a capacity market participant on the list:</p> <ul style="list-style-type: none"> (a) hours in which there was a state of markets suspension; (b) hours that the ISO determines that the asset was affected by: <ul style="list-style-type: none"> (i) an event of limited markets operations, war, invasion, armed conflict, blockade, act of public enemy, riot, revolution, insurrection, act of terrorism, sabotage, act of vandalism, fire that does not originate at the asset, lightning, explosion, earthquake or flooding; and (ii) a mothball outage or temporary economic delist outage; (c) hours in which the asset had no production or consumption history; (d) hours in which the asset was commissioning; and (e) in the case of an import asset, hours in which the relevant transfer path was unavailable as a result of an issue on the Alberta transmission system. 	
3	(2)	<p>The ISO may, in the case of a long lead time asset that was synchronized but had varying start-up times for distinct portions of its MW and which required more than 1 hour to deliver such additional portions of its MW, remove the hours where the ISO determines that:</p> <ul style="list-style-type: none"> (a) the pool participant reason in the Energy Trading System indicates that the asset was offline for a long lead time configuration; or (b) the cost assessment for the asset exceeds the pool price; <p>in order to create an historical data set for each long lead time asset listed for a capacity market participant on the list.</p>	
3	(3)	<p>The ISO must, if it determines that the asset was impacted by a transmission market constraint during an hour in the asset’s historical data set, add the volume that was</p>	

Section	Subsection	Proposed language	Stakeholder comments
		curtailed to the metered volume in that hour for the purposes of calculating the uniform capacity value for the asset in accordance with subsection 5(2).	
		Selection of Methodologies for Uniform Capacity Value Calculation	
4		<p>The ISO must, when calculating a uniform capacity value for an asset, apply the methodologies as follows:</p> <ul style="list-style-type: none"> (a) if the number of hours in the historical data set determined in accordance with subsection 3 is greater than or equal to 300 hours and less than or equal to 1250 hours then the methodologies in subsection 5 will be applied to the hours in the historical data set; (b) if the number of hours in the historical data set determined in accordance with subsection 3 is greater than or equal 1 hour and less than 300 hours then: <ul style="list-style-type: none"> (i) the methodologies in subsection 5 will be applied to the hours in the historical data set, as applicable; and (ii) the methodology in subsection 6 will be applied to the number of hours that is 300 hours minus the hours in the historical data set, determined in accordance with subsection 3; <p>or</p> <ul style="list-style-type: none"> (c) if the number of hours in the historical data set determined in accordance with subsection 3 is 0 hours then the methodology in subsection 6 will be applied to 300 hours. 	
		Methodologies for Hours in the Historical Data Set	
5	(1)	<p>The ISO must, subject to subsections 5(2) through 5(8) calculate a uniform capacity value for an asset as follows:</p> <ul style="list-style-type: none"> (a) calculate the hourly availability factor using the time weighted available capability as observed in the Energy Trading System, divided by maximum capability observed in each hour in the historical data set; (b) calculate the availability factor by averaging the hourly availability factors as 	

Section	Subsection	Proposed language	Stakeholder comments
		<p>calculated in subsection 5(1)(a) over the number of hours in the historical data set; and</p> <p>(c) multiply the availability factor calculated in subsection 5(1)(b) by the asset's maximum capability.</p>	
5	(2)	<p>The ISO must calculate a uniform capacity value for a wind or solar aggregated generating facility or a run of river hydroelectric generating unit or aggregated generating facility, or an aggregated asset containing a wind or solar aggregated generating facility or a run of river hydroelectric generating unit or aggregated generating facility, or assets that do not receive a dispatch as follows:</p> <p>(a) calculate the hourly capacity factor by adding metered energy and applicable ancillary services volumes observed in each hour in the historical data set, and dividing by maximum capability;</p> <p>(b) calculate the capacity factor by averaging each hourly capacity factor in subsection 5(2)(a) over the number of hours in the historical data set; and</p> <p>(c) multiply the capacity factor calculated in subsection 5(2)(b) by the asset's maximum capability.</p>	
5	(3)	<p>The ISO must calculate a uniform capacity value for an import asset as follows:</p> <p>(a) calculate the lesser of an asset's available capability or an asset's firm transmission over a transfer path observed in each hour in the historical data set, and dividing by an asset's firm transmission capacity over a transfer path;</p> <p>(b) calculate the availability factor by averaging each hourly availability factor in subsection 5(3)(a) over the number of hours in the historical data set; and</p> <p>(c) multiply the availability factor calculated in subsection 5(3)(b) by an asset's firm transmission capacity over a transfer path.</p>	
5	(4)	The ISO must calculate a uniform capacity value for a site with one or more onsite	City of Medicine Hat (CMH) is concerned with the regression approach as it appears to

Section	Subsection	Proposed language	Stakeholder comments
		<p>generating units or aggregated generating facilities that self-supplies capacity and is dispatched gross-to-grid as follows:</p> <ul style="list-style-type: none"> (a) calculate a gross uniform capacity value using the availability factor of the asset on the self-supply site as observed in each of the hours in the historical data set; and (b) translate the gross uniform capacity value calculated in subsection 5(4)(a) to a net uniform capacity value using a linear regression of net-to-grid energy relative to the energy market dispatches issued to the asset on the self-supply site. 	<p>discount the capacity that would be available from CMH. Non-dispatched capacity within CMH territory is not directly tied to any load and there is no reason to believe that if 20 MW of non-dispatched capacity was dispatched in real-time would not all show up as an increase to net to grid supply. The AESO has not demonstrated a rationale for its view that a MW of capacity from CMH territory would not be expected to benefit the grid if it was dispatched.</p> <p>CMH further notes that there are a number of assets within its territory and CMH is in effect an aggregator for these facilities. The Rule does not appear to contemplate this situation as the AESO will need to estimate the UCV based on a number of assets including those (2 today) with different participant IDs. As noted in Rule 206.1, CMH is concerned with the prescriptive nature of the qualification of capacity and does not believe the AESO should dictate what types of assets or projects CMH can use within the capacity market.</p> <p>For example, CMH could be, in effect, an aggregator of generation, solar generation, wind generation, demand response, energy efficiency and storage all behind its fence. The AESO should not discount any of these resources.</p>
5	(5)	<p>The ISO must, subject to subsection 7, calculate a uniform capacity value for a load asset providing firm consumption level as follows:</p> <ul style="list-style-type: none"> (a) identify the metered energy for the settlement intervals with the same hour ending as the hour the historical data set in the following days: <ul style="list-style-type: none"> (i) the 15 most recent business days prior to the day with the hour in the historical data set if the hour falls on a business day; (ii) the 10 most recent weekend days or holidays prior to the day with the hour in the historical data set if the hour falls on a weekend day or a holiday; or (iii) the days the ISO specifies if, in the 45 day period prior to the day with the hour in the historical data set, there are fewer than 15 business days and 10 weekend days when days containing settlement intervals identified in subsection 5(5)(b) are excluded; 	

Section	Subsection	Proposed language	Stakeholder comments
		(b) determine if any settlement intervals referred to in subsection 5(a) contain any of hours in the historical data set in accordance with subsection 2; (c) calculate the qualified baseline as the average of the metered energy for the settlement intervals referred to in subsection 5(5)(a) excluding the metered energy for the settlement intervals identified in subsection 5(5)(b); and (d) minus an asset's declared firm consumption level from the qualified baseline calculated in subsection 5(5)(b).	
5	(6)	The ISO must calculate a uniform capacity value for a load asset providing guaranteed load reduction as the guaranteed load reduction declared in accordance with Section 206.1, <i>Qualification of Capacity</i> .	
5	(7)	The ISO must calculate a uniform capacity value for an asset with incremental capacity by multiplying the performance factor calculated in accordance with subsections 5(1) through 5(6), as applicable, by the sum of the assets maximum capability and the amount of incremental capacity.	
5	(8)	The ISO must calculate a uniform capacity value for an asset that undergoes a derate in its maximum capability in accordance with subsection 5, as applicable, substituting the maximum capability of the asset for its derated maximum capability .	
5	(9)	Where the uniform capacity value for at least 1 asset in an aggregated asset would otherwise be calculated in accordance with subsection 5(2), the ISO must calculate the uniform capacity value of all assets in the aggregated asset in accordance with subsection 5(2).	
		Methodologies for Hours not in the Historical Data Set	
6	(1)	The ISO must calculate a uniform capacity value for an asset in accordance with subsection 4, as follows: (a) using a class average performance factor multiplied by maximum capability , where	

Section	Subsection	Proposed language	Stakeholder comments
		<p>the class average performance factor is:</p> <ul style="list-style-type: none"> (i) for a load asset, 91% unless the ISO specifies a class average performance factor based on Alberta load data; or (ii) for all other assets, as specified by the ISO; (b) if a class average performance factor is not available, using a performance factor based on engineering studies or equivalent engineering documents, or production or load estimates of the asset multiplied by maximum capability; or (c) if a class average performance factor and production or load estimates are not available, using a performance factor based on a review of similar assets in other jurisdictions multiplied by maximum capability. 	
6	(2)	<p>The ISO must calculate a uniform capacity value for an import asset where the hours in the historical data set are less than 250 as follows:</p> <ul style="list-style-type: none"> (a) using the value declared, in accordance with Section 206.1, <i>Qualification of Capacity</i>, for the import asset; and (b) derating the value declared, in accordance with Section 206.1, <i>Qualification of Capacity</i>, to reflect the hours in the 1250 hours determined in accordance with subsection 2 where the British Columbia transfer path, Montana transfer path or Saskatchewan transfer path, as applicable, was out of service with an available transfer capability of 0 MW. 	
		<p>Test Requirement for Load Asset Providing a Firm Load Consumption</p>	
7	(1)	<p>A capacity market participant must, if there were no delivery hours in the obligation period prior to obligation period that the ISO is calculating a uniform capacity value for in accordance with subsection 6(5), demonstrate to the ISO the ability of a load asset providing a firm consumption level to reduce down to the firm consumption level declared by the capacity market participant and maintain the reduction for 1 hour.</p>	
7	(2)	<p>The ISO must, in the event that the load asset providing a firm consumption level fails the demonstration in subsection 7(1), adjust the uniform capacity value calculated in</p>	

Section	Subsection	Proposed language	Stakeholder comments
		accordance with subsection 6(5) to reflect the observed load reduction.	
		Calculation of Ranges for a Uniform Capacity Value	
8	(1)	<p>The ISO must, subject to subsection 8(2), calculate 3 ranges for a uniform capacity value on an asset-specific basis as follows:</p> <p>(a) the 5% range, as follows:</p> <ul style="list-style-type: none"> (i) calculate the upper limit, as follows: <ul style="list-style-type: none"> (A) remove 5% of the hours identified in the historical data set, in which the asset’s availability factor or capacity factor, as applicable, was the lowest; (B) average the asset’s remaining availability factor or capacity factor, as applicable; and (C) multiply the average remaining availability factor or capacity factor, as applicable, by the asset’s maximum capability; and (ii) calculate the lower limit, as follows: <ul style="list-style-type: none"> (A) remove 5% of the hours identified in the historical data set, in which the asset’s availability factor or capacity factor, as applicable, was the highest; (B) average the asset’s remaining availability factor or capacity factor, as applicable; and (C) multiply the average remaining availability factor or capacity factor, as applicable, by the asset’s maximum capability; <p>(b) the +/- 2% range, as follows:</p> <ul style="list-style-type: none"> (i) calculate the upper limit, as follows: <ul style="list-style-type: none"> (A) 2% multiplied by the maximum capability; (B) added to the uniform capacity value; and 	<p>City of Medicine Hat requests clarity on how the range for UCV will be estimated for its unique situation. There are a number of assets that will make up the overall UCV and the Rule does not specify how the regression will work to establish a range. What data will be removed from the range? The observations that increase or decrease the UCV by the largest amount?</p>

Section	Subsection	Proposed language	Stakeholder comments
		<ul style="list-style-type: none"> (ii) calculate the lower limit, as follows: <ul style="list-style-type: none"> (A) 2% multiplied by the maximum capability; (B) subtracted from the uniform capacity value; and (c) the +/- 1 MW range, as follows: <ul style="list-style-type: none"> (i) calculate the upper limit by adding 1 MW to the uniform capacity value; and (ii) calculate the lower limit by subtracting 1 MW to the uniform capacity value. 	
8	(2)	<p>The ISO must not calculate the uniform capacity value ranges in subsection 7(1) for:</p> <ul style="list-style-type: none"> (a) assets with new capacity or refurbished capacity; (b) incremental capacity; (c) a load asset; and (d) an import asset. 	
		<p>Notification of Tightest Supply Cushion Hours and Preliminary Uniform Capacity Values</p>	
9	(1)	<p>The ISO must publish on the AESO website:</p> <ul style="list-style-type: none"> (a) the 1250 tightest supply cushion hours identified in accordance with subsection 2; and (b) the class averages referred to in subsection 6(a). 	
9	(2)	<p>The ISO must provide the following information to a capacity market participant on an asset-specific basis:</p> <ul style="list-style-type: none"> (a) the hours in the historical data set, referred to in subsection 3; (b) the uniform capacity value calculated in accordance with subsections 4, 5 and 6, as applicable; 	

Section	Subsection	Proposed language	Stakeholder comments
		<p>(c) the methodology used to calculate the uniform capacity value;</p> <p>(d) the greatest of the upper limits calculated in accordance with subsections 8(1)(a)(i), 8(1)(b)(i) and 8(1)(c)(i) to a maximum of the asset's maximum capability; and</p> <p>the lowest of the lower limits calculated in accordance with subsection 8(1)(a)(ii), 8(1)(b)(ii) and 8(1)(c)(ii) to a minimum of 1 MW.</p>	
		<p>Uniform Capacity Value Variances</p>	
10	(1)	<p>A capacity market participant may, within the timelines prescribed by the <i>Capacity Market Auction</i> Guidelines and in the manner specified by the ISO, submit to the ISO:</p> <p>(a) a request to vary the uniform capacity value of an asset for a reason set out in subsection 10(2); and</p> <p>(b) detailed information in support of the request, including, as applicable:</p> <p>(i) metering or Energy Trading System data;</p> <p>(ii) information regarding a planned or completed physical change to the asset demonstrating that the maximum capability will increase or decrease by at least 1 MW;</p> <p>(iii) the characteristics, selection criteria and rationale for comparable assets, for class average and jurisdictional assessment requests, including:</p> <p>(A) maximum capability; and</p> <p>(B) available production and load data, and</p> <p>(iv) engineering studies or equivalent engineering documents, or production or load estimates which are specific to the asset at its location, completed by a qualified professional engineer.</p>	
10	(2)	<p>The ISO may accept a request made in accordance with subsection 10(1) on the following:</p> <p>(a) the metering or Energy Trading System data during the historical data set evaluated by the ISO did not accurately reflect the available capability of the</p>	<p>Is this the point in the process where the City of Medicine Hat (CMH) will be able to adjust its UCV for anticipated load growth, as an example? CMH is concerned this process will be unnecessarily onerous and requests clarity on the requirements to submit an expected change to UCV. The unique nature of CMH situation means that UCV could be expected</p>

Section	Subsection	Proposed language	Stakeholder comments
		asset; (b) the asset has or will undergo a physical change before the start of the obligation period that will increase or decrease the maximum capability of the asset by at least 1 MW; or (c) where the class average data, production or load estimates, or jurisdictional assessment used in calculating the uniform capacity value , in accordance with subsections 6(1)(a)(ii), 6(1)(b) or 6(1)(c), does not create a comparable representation of the asset's future performance.	to change due to a wide range of reasons such as: 1. New generation (wind, solar and/or thermal, both utility scale and distributed) 2. Load growth or destruction (new/expanded customers, energy efficiency, residential solar, other)
10	(3)	The ISO must notify the capacity market participant of its decision.	
		Declaration and Assignment of Final Uniform Capacity Value	
11	(1)	A capacity market participant must, in accordance with the timelines specified in the <i>Capacity Market Auction Guidelines</i> declare to the ISO , as applicable, the uniform capacity value within the range identified in subsection 8(1) that it will use for the auction.	
11	(2)	The ISO must, in accordance with the timelines specified in the <i>Capacity Market Auction Guidelines</i> , notify the capacity market participant of its assigned uniform capacity value .	

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 206.3, <i>Uniform Capacity Value Determination</i> relates to the capacity market and why or why not	
2	whether you agree that the proposed new ISO Rule – Section 206.3, <i>Uniform Capacity Value Determination</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 206.3, <i>Uniform Capacity Value Determination</i> and whether, in your view, the proposed new ISO Rule – Section 206.3, <i>Uniform Capacity Value Determination</i> meets the objective or purpose	
4	how, in your view, the proposed new ISO Rule – Section 206.3, <i>Uniform Capacity Value Determination</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 206.3, <i>Uniform Capacity Value Determination</i>	
6	whether you agree with the proposed new ISO Rule – Section 206.3, <i>Uniform Capacity Value Determination</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 206.3, <i>Uniform Capacity Value Determination</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 206.3, Uniform Capacity Value Determination.

Proposed Amended ISO rule – Section 206.4, Offers and Bids for Capacity

Period of Comment:	September 7, 2018	through	September 28, 2018	Contact:	Rochelle Pancoast
Comments From:	City of Medicine Hat			Phone:	403-529-8288
Date [yyyy/mm/dd]:	2018/09/28			Email:	rocpan@medicinehat.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
		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; (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; and (c) less than or equal to the maximum price established by the final demand curve. 	
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 final 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; 	<p>City of Medicine Hat believes that there should be a 'dead band' around the requirement to repurchase capacity in the rebalancing auction. If capacity falls by 1 MW relative to the initial UCV for example it should not be necessary to purchase that capacity in the rebalancing auction.</p>

Section	Subsection	Proposed language	Stakeholder comments
		<p>(b) if the ISO determines that the capacity market participant has missed a critical milestone subject to Section 206.5 of the ISO rules, <i>Forward Period Milestone Requirements</i>, the capacity market participant must submit a bid equal to its entire capacity commitment in the applicable rebalancing auction; or</p> <p>(c) if the ISO determines for a load asset that the capacity market participant has not met the milestone set out in Section 206.5 of the ISO rules, <i>Forward Period Milestone Requirements</i>, then that capacity market participant must submit a bid for the difference between the capacity commitment and the assigned uniform capacity value in the final rebalancing auction.</p>	

Please provide your comments on this rule's appendices:

Empty rectangular box for comments.

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 – <i>Section 206.4, Offers and Bids for Capacity</i> relates to the capacity market and why or why not	
2	whether you agree that amended ISO rule – <i>Section 206.4, Offers and Bids for 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 amended ISO rule – <i>Section 206.4, Offers and Bids for Capacity</i> and whether, in your view, <i>Section 206.4, Offers and Bids for Capacity</i> meets the objective or purpose	
4	how, in your view, amended ISO rule – <i>Section 206.4, Offers and Bids for 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 amended ISO rule – <i>Section 206.4, Offers and Bids for Capacity</i>	
6	whether you agree with amended ISO rule – <i>Section 206.4, Offers and Bids for 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 amended ISO rule – <i>Section 206.4, Offers and Bids for 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 amended ISO rule – Section 206.4, Offers and Bids for Capacity.

Proposed New ISO rule – Section 203.5, *Energy Market Mitigation*

Period of Comment:	September 7, 2018	through	September 28, 2018	Contact:	Rochelle Pancoast
Comments From:	City of Medicine Hat			Phone:	403-529-8288
Date [yyyy/mm/dd]:	2018/09/28			Email:	rocpan@medicinehat.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 203.5 applies to: <ul style="list-style-type: none"> (a) a pool participant that submit offers in the energy market for a source asset ; (b) the legal owner of a generating unit or aggregated generating facility; and (c) the ISO. 	
		Requirements Expected Supply Cushion for Mitigation	
2	(1)	The ISO must: <ul style="list-style-type: none"> (a) publish the method for calculating the expected supply cushion on the AESO website; and (b) provide 120 days' notice notice to pool participant before changing to the method for calculating the expected supply cushion published in accordance with subsection 2(1)(a). 	
2	(2)	The ISO must, for each settlement interval :	

Section	Subsection	Proposed language	Stakeholder comments
		<ul style="list-style-type: none"> (a) calculate the expected supply cushion using the method published in accordance with subsection 2(1)(a); (b) publish the expected supply cushion on the AESO website prior to the settlement interval; (c) update the expected supply cushion as soon as reasonably practicable upon a change to 1 or more of the inputs to the calculation of the expected supply cushion; (d) select a value of the expected supply cushion observed during the two hours immediately prior to the settlement interval; (e) publish the value of the expected supply cushion which is selected for each settlement interval under subsection 2(2)(d) as soon as reasonably practicable after such selection is made. 	
		Asset-Specific Cost Information –Generating Unit or Aggregated Generating Facility	
3	(1)	<p>A pool participant must submit to the ISO, in the manner the ISO specifies, the following cost information related to the short-run marginal costs for a thermal generating unit or aggregated generating facility:</p> <ul style="list-style-type: none"> (a) heat rate; (b) if the source asset's fuel is not natural gas, fuel cost; (c) financial exposure to greenhouse gas emissions costs; and (d) any further cost information the ISO specifies. 	<p>City of Medicine Hat (CMH) submits that it is not necessary for small participants to submit this data as they will never be mitigated. The administrative burden for CMH is completely unnecessary given it can never export 250 MW of energy to the AIES. As such, the applicability of this rule should be restricted to participants with more than 250 MW of net capacity.</p>
3	(2)	<p>A pool participant must, in relation to the cost information submitted pursuant to subsection 3(1):</p> <ul style="list-style-type: none"> (a) submit the cost information to the ISO: <ul style="list-style-type: none"> (i) for a generating unit or aggregated generating facility that has energized and commissioned, on or before a date the ISO specifies; or (ii) for a generating unit or aggregated generating facility that has not completed energization and commissioning, before the energization and commissioning of such generating unit or aggregated 	

Section	Subsection	Proposed language	Stakeholder comments
		<p style="text-align: center;">generating facility.</p> <ul style="list-style-type: none"> (b) determine the values of such cost information assuming that the generating unit or aggregated generating facility is operating under normal operating conditions at maximum capability; and (c) submit updated cost information to the ISO as soon as reasonably practicable upon becoming aware of any material change in the cost information submitted in accordance with subsection 3(1). (d) an attestation by a corporate officer of the pool participant that the cost information provided pursuant to subsection 3(1) is complete and accurate. 	
3	(3)	The ISO may, with respect to cost information submitted pursuant to subsection 3(1), exclude costs determined by the ISO to be unreasonable.	
3	(4)	The ISO must select alternate values for the cost information submitted pursuant to subsection 3(1) if such costs have been excluded pursuant to subsection 3(3).	
3	(5)	<p>The ISO must:</p> <ul style="list-style-type: none"> (a) identify the current carbon price from the appropriate public authority; (b) identify the natural gas price for each day on a day-ahead basis, or as close to a day-ahead basis as reasonably practicable; and (c) estimate the variable operations and maintenance costs for a generating unit or aggregated generating facility on a class-specific basis. 	
		Asset-Specific Reference Price – Generating Unit or Aggregated Generating Facility	
4	(1)	<p>The ISO must, using the cost information derived pursuant to subsection 3, calculate an estimated short-run marginal cost for producing power, measured in dollars per MWh, for each generating unit or aggregated generating facility for each settlement interval as a sum of the following:</p> <ul style="list-style-type: none"> (a) the heat rate multiplied by the fuel price, if applicable; (b) the exposure to greenhouse gas emissions costs multiplied by the carbon price from the appropriate public authority, if applicable; and 	City of Medicine Hat (CMH) requests clarity on how this process will work where there are a range of asset types behind a fence. For example, if CMH is mitigated, will it have a different offer cap for different portions of its capacity or will the presumption be that the exports are coming from the most expensive unit in the portfolio?

Section	Subsection	Proposed language	Stakeholder comments
		(c) the estimated variable operations and maintenance cost.	
4	(2)	<p>The ISO must, using the estimated short-run marginal costs derived pursuant to subsection 4(1), set the asset-specific reference price for each generating unit or aggregated generating facility for each settlement interval as an amount equal to:</p> <ul style="list-style-type: none"> (a) the estimated short run marginal cost multiplied by 3, if the expected supply cushion selected for the settlement interval under subsection 2(2)(d) is 1,000 MW or greater; (b) the estimated short run marginal cost multiplied by 6, if the expected supply cushion selected for the settlement interval under subsection 2(2)(d) is 250 MW or greater and less than 1,000 MW; and (c) the maximum permissible price for an offer made under section 203.1 of the ISO rules, Offers and Bids for Energy, if the expected supply cushion selected for the settlement interval under subsection 2(2)(d) is less than 250 MW. 	
		Asset-Specific Reference Price – Prescribed Non-Thermal Generating Source Assets Capable of Storing Energy	
5	(1)	The ISO may prescribe a set of non-thermal generating source assets to which this subsection 5 is applicable, provided that each generating source asset is capable of storing its fuel.	
5	(2)	The ISO must, if the ISO prescribes a set of generating source assets in accordance with subsection 5(1) publish the list of such prescribed generating source assets on the AESO website.	
5	(3)	<p>The ISO must, subject to subsection 5(4), set the asset-specific reference price for generating source assets prescribed pursuant to subsection 5(1) for each settlement interval as an amount equal to:</p> <ul style="list-style-type: none"> (a) the 30-day rolling average pool price most recently published by the ISO multiplied by 3, if the expected supply cushion selected for the settlement interval under subsection 2(2)(d) is 1,000 MW or greater; (b) the 30-day rolling average pool price most recently published by the ISO multiplied by 6, if the expected supply cushion selected for the settlement 	

Section	Subsection	Proposed language	Stakeholder comments
		<p>interval under subsection 2(2)(d) is 250 MW or greater and less than 1,000 MW; and</p> <p>(c) the maximum permissible price for an offer made under section 203.1 of the ISO rules, Offers and Bids for Energy, if the expected supply cushion selected for the settlement interval under subsection 2(2)(d) is less than 250 MW.</p>	
5	(4)	<p>Notwithstanding subsection 5(3), if a pool participant, for any generating source asset prescribed pursuant to subsection 5(1) for a settlement interval, has satisfied the asset-specific requirements for participation in the ancillary services market referred to in subsection 5(5), then the ISO must, set the asset-specific reference price for such generating source asset for the settlement interval as an amount equal to the maximum permissible price for an offer made under Section 203.1 of the ISO rules, Offers and Bids for Energy.</p>	
5	(5)	<p>The ISO must:</p> <p>(a) publish the asset-specific requirements for participation in the ancillary services market on the AESO website; and</p> <p>(b) provide 120 days' notice to pool participants before changing to the asset-specific requirements published in accordance with subsection 5(5)(a).</p>	
		<p>Asset-Specific Reference Price – Import Source Assets</p>	
6	(1)	<p>The ISO must set the asset-specific reference price for each import source asset for each settlement interval as an amount equal to:</p> <p>(a) $MidC(on\ peak) + \min\{100, 3 * MidC(on\ peak)\}$, if the expected supply cushion selected for the settlement interval under subsection 2(2)(d) is 1,000 MW or greater;</p> <p>(b) $MidC(on\ peak) + \min\{100, 6 * MidC(on\ peak)\}$, if the expected supply cushion selected for the settlement interval under subsection 2(2)(d) is 250 MW or greater and less than 1,000 MW;</p> <p>where $MidC(on\ peak)$ is the day-ahead, on-peak price in the Mid-Columbia market for delivery on the same day as the energy market in Alberta;</p> <p>or</p>	

Section	Subsection	Proposed language	Stakeholder comments
		(c) the maximum permissible price for an offer made under section 203.1 of the ISO rules , <i>Offers and Bids for Energy</i> , if the expected supply cushion selected for the settlement interval under subsection 2(1)(d) is less than 250 MW.	
		Asset-Specific Reference Price – Limitations and Exemptions	
7	(1)	Notwithstanding subsections 4, 5 and 6, the ISO must not set the asset-specific reference price for any source asset for any settlement interval as an amount: <ul style="list-style-type: none"> <li data-bbox="505 581 844 613">(a) less than \$25/MWh; or <li data-bbox="505 630 1481 688">(b) greater than the maximum permissible price for an offer made under section 203.1 of the ISO rules, <i>Offers and Bids for Energy</i>. 	
7	(2)	A pool participant may request that the ISO provide a variance from any asset-specific reference price determined pursuant to subsections 4, 5, or 6.	
7	(3)	The ISO may, upon receiving a request pursuant to subsection 7(2), assign a different asset-specific reference price determined pursuant to subsections 4, 5, or 6 if the ISO is satisfied that the pool participant would not be able to reasonably recover the short run marginal costs and cycling costs of the source asset within the scope of the asset-specific reference price determined pursuant to subsections 4, 5, or 6.	
		Market Power Screen	
8	(1)	The ISO must identify those persons , using the methodology for the calculation of market share offer control described in section 5 of the <i>Fair, Efficient, and Open Competition Regulation</i> , that have offer control over one or more source assets for the purposes of identifying a person as having market power.	
8	(2)	The person identified under subsection 8(1) may submit to the ISO , in the manner the ISO specifies, supply obligations in MW for each settlement interval , at least 2 hours prior to the start of the settlement interval , for the purposes of the expected residual supply index.	
8	(3)	A person who submits supply obligations in accordance with subsection 8(2) must submit a value that is equal to or less than the person's actual supply obligations .	

Section	Subsection	Proposed language	Stakeholder comments
8	(4)	<p>The ISO must, for each person identified under subsection 8(1) and in the offer control information for an operating block in respect of a settlement interval, calculate a value called the expected residual supply index for each settlement interval for the person identified under subsection 8(1) as follows:</p> <ul style="list-style-type: none"> (a) the expected supply from all source assets for the settlement interval; (b) minus the expected supply from all source assets under the offer control of a person identified under subsection 8(1), net of the supply obligations of the person identified under subsection 8(1), for the settlement interval; and (c) divided by expected demand from all sink assets for the settlement interval. 	
8	(5)	<p>The ISO must select the expected residual supply index referenced in subsection 8(1) during the 2 hours immediately prior to the settlement interval.</p>	
8	(6)	<p>The ISO must identify a person with a expected residual supply index of less than 1 for a given settlement interval as having market power in that settlement interval.</p>	
8	(7)	<p>The ISO must not reconsider the conclusion drawn under subsection 8(4) if market conditions change at any time after the expected residual supply index is selected for the settlement interval under subsection 8(3).</p>	
		<p>Mitigation of Market Power</p>	
9	(1)	<p>The ISO must, for each settlement interval, identify each operating block associated with a source asset under the offer control of a person identified under subsection 8(4) that has an offer price that is greater than the asset-specific reference price of the related source asset which was determined pursuant to subsections 4, 5, or 6.</p>	
9	(2)	<p>Subject to subsection 9(3), the ISO must change the offer price of an operating block identified under subsection 9(1) to the asset-specific reference price of the associated source asset as determined under subsection 4, 5 or 6 if the operating block is:</p> <ul style="list-style-type: none"> (a) controlled by a single person that has been identified as having market power under subsection 8(4), (b) controlled by multiple persons which have all been identified as having market power under subsection 8(4), or 	

Section	Subsection	Proposed language	Stakeholder comments
		<p>(c) declared to be inflexible in accordance with Section 203.1 of the ISO rules, Offers and Bids for Energy, and is at least partially controlled by a person that has been identified as having market power under subsection 8(4).</p>	
9	(3)	<p>The ISO must, if an operating block identified under subsection 9(1) is declared to be flexible under Section 203.1 of the ISO rules, Offers and Bids for Energy, and is partially, but not fully, controlled by one or more person identified as having market power under subsection 8(4), split the existing operating block into two operating blocks as follows:</p> <ul style="list-style-type: none"> (a) create a new operating block that contains the quantity of the existing operating block that is controlled by the person identified as having market power under subsection 8(4) and select an offer price equal to the asset-specific reference price of the associated source asset; and (b) reduce the quantity of the existing operating block by the quantity of the newly created operating block, with no associated change made to the offer price of the operating block. 	
		<p>Timely Information from Legal Owner</p>	
10		<p>A legal owner of a generating unit or aggregated generating facility must, if it is not the pool participant for that generating unit or aggregated generating facility:</p> <ul style="list-style-type: none"> (a) provide such timely and complete information to the pool participant for such source asset to enable the pool participant to comply with its obligations under subsection 3; and (b) provide an attestation to the pool participant from a corporate officer of the legal owner of such generating unit or aggregated generating facility to enable the pool participant to comply with its obligations under subsection 3(2)d. 	

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 203.5, <i>Energy Market Mitigation</i> relates to the capacity market and why or why not	
2	whether you agree that the proposed new ISO Rule – Section 203.5, <i>Energy Market Mitigation</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 203.5, <i>Energy Market Mitigation</i> and whether, in your view, the proposed new ISO Rule – Section 203.5, <i>Energy Market Mitigation</i> meets the objective or purpose	
4	how, in your view, the proposed new ISO Rule – Section 203.5, <i>Energy Market Mitigation</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 203.5, <i>Energy Market Mitigation</i>	
6	whether you agree with the proposed new ISO Rule – Section 203.5, <i>Energy Market Mitigation</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 203.5, <i>Energy Market Mitigation</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 203.5, Energy Market Mitigation.