# Stakeholder Comment Matrix

## Proposed Amended ISO rule –Section 201.5, *Block Allocation*

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| **Period of Comment:** | October 26, 2018 | through | November 14, 2018 | **Contact:** | Clarke Lind |
| **Comments From:** | Powerex | | | **Phone:** | 604.891.6034 |
| **Date [2018/11/09]:** | | | | **Email:** | |

***Please include any suggestions for alternative rule wording and accompanying rationale in the table below. Cut and paste the existing rule wording into column one below and track in your changes.***

| Blackline of Suggested Rule Wording | Rationale |
|---|---|
| **Operating Block Allocation**<br>2(1) The ISO must allocate to each pool participant 1, or multiple pool ID per pool asset. | Powerex requests that the AESO provide a rationale for limiting one pool ID per pool asset for each pool participant.<br>Throughout the CMD stakeholder process, Powerex understood that each import asset could request 1 price-taker asset, and 1 priced asset with 7 price-quantity pairs. Therefore, a pool participant could have multiple pool IDs per pool asset. As such, it is unclear why subsection 2(1) limits 1 pool ID per pool asset.<br>Would an import asset use the first price-quantity pair to represent any price-taker volume ($0 offers)?<br>Is the price-taker pair going to be dispatched within the hour like the other price-quantity pairs or will it be considered a schedule for the hour?<br>Reading subsection 2(1) it appears an import asset can submit an E-Tag for $0 priced blocks prior to dispatch. However, it is unclear if the AESO will then dispatch that $0 priced block prior to the hour (as is the case currently), or if the AESO will dispatch the $0 offer within the hour. |
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***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 Section 201.5, *Block Allocation* relates to the capacity market and why or why not | |
| 2 | whether you agree that Section 201.5, *Block Allocation* 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 Section 201.5, *Block Allocation* and whether, in your view, Section 201.5, *Block Allocation* meets the objective or purpose | |
| 4 | how, in your view, Section 201.5, *Block Allocation* affects the performance of the capacity market and the electricity market | |
| 5 | your views on any analysis conducted or commissioned by the AESO supporting Section 201.5, *Block Allocation* | |
| 6 | whether you agree with Section 201.5, *Block Allocation* 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 Section 201.5, *Block Allocation* | |
| 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 | |
| 10 | whether you have any additional comments | |

# Stakeholder Comment Matrix

## Proposed New ISO rule –Section 201.13, *Capacity Market Clearing*

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|---|---|---|---|---|---|
| **Period of Comment:** | October 26, 2018 | through | November 14, 2018 | **Contact:** | Clarke Lind |
| **Comments From:** | Powerex Corp | | | **Phone:** | 604.891.6034 |
| **Date [2018/11/09]:** | | | | **Email:** | Clarke.lind@powerex.com |

***Please include any suggestions for alternative rule wording and accompanying rationale in the table below. Cut and paste the existing rule wording into column one below and track in your changes.***

| Blackline of Suggested Rule Wording | Rationale |
|---|---|
| **Transfer Path Limits Calculation**<br><br>3(2) The ISO must, for a base auction or rebalancing auction, determine the limits on the British Columbia transfer path, Montana transfer path, Saskatchewan transfer path, and the combined British Columbia and Montana transfer paths by averaging the following hourly limits for each of the 250 tightest supply cushion hours identified in subsection 3(1) prior to the base auction or rebalancing auction, as applicable:<br><br>(a) for the British Columbia transfer path, by assigning an hourly limit based on: ~~**minimum of**~~:<br><br>- (i) the hourly import available transfer capability for the British Columbia transfer path; ~~**or**~~<br><br>- ~~**(ii) the hourly long-term firm transmission service on the British Columbia transfer path;**~~<br><br>(b) for the Montana transfer path, by assigning an hourly limit based on: ~~**minimum of**~~**:**<br><br>- (i) the hourly import available transfer capability for the Montana transfer path; ~~**or**~~<br><br>- ~~**(ii) the hourly long-term firm transmission service on the Montana transfer path;**~~<br><br>(c) for the Saskatchewan transfer path, by assigning an hourly limit based on: ~~**minimum of**~~**:**<br><br>- (i) the hourly import available transfer capability for the Saskatchewan transfer path~~; or~~<br><br>~~- (ii) the hourly long-term firm transmission service on the Saskatchewan transfer path; and~~<br><br>(d) for the combined British Columbia and Montana transfer path, by assigning an hourly limit based | **1. Subsection 3(2): Artificially constrains an intertie's capability by reducing the ATC to the firm rating each hour of the 250 tightest supply cushion hours.**<br><br>- There are many hours in which the BC intertie's ATC exceeds the intertie's firm rating.<br><br>- The AESO's Transfer Path Limits Calculation should average the specific intertie's (BC, MATL and SASK) ATC during the tightest 250 hours identified in subsection 3(1).<br><br>- The average hourly ATC over the 250 tightest supply cushion hours identified in subsection 3(1) should then be compared to that intertie's firm transmission rating.<br><br>- The lesser of the two would be used to determine the intertie's Transfer Path Capability.<br><br>o (This is proposed in Powerex's suggested rule wording for a new subsection 3(3)) included in the blacklined suggestion)<br><br>- Note - This methodology would incorporate all 0 MW ATC hours, demonstrating the true average ATC of the intertie during the tightest 250 hours per year over the previous five years.<br><br>**2. Subsection 3(2): "Long term," and "Firm transmission" are not defined**<br><br>- Subsection 3(2) is unclear because the AESO has not defined "**long-term**," and "**Firm transmission**." |

| Blackline of Suggested Rule Wording | Rationale |
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| on: ~~**minimum of**~~**:**<br><br>- (i) the hourly import available transfer capability for the combined British Columbia and Montana transfer path. ~~**prior to LSSI arming; or**~~<br><br>**-** ~~**(ii) combined hourly long-term firm transmission for the British Columbia and Montana transfer paths**~~<br><br>**3(3) For the purposes of determining the transfer path capability of the British Columbia transfer path, Montana transfer path, Saskatchewan transfer path, and combined British Columbia and Montana transfer path, [the transfer paths] identified in subsection 3(1) is the lesser of:**<br><br>**(a) The average hourly import available transfer capability identified in subsection 3(2); or**<br><br>(b) **The firm transmission service of the transfer path for British Columbia, Montana and Saskatchewan**; or<br><br>(c) **The combined transfer path for British Columbia and Montana** | - Powerex requests that the AESO define "**long-term**" firm transmission. Or, extract the reference to "**long-term**" in subsection 3(2).<br><br>- Powerex also requests that the AESO define '**Firm Transmission**".<br><br>- Note - The "reliability" of firm transmission can vary from one Transmission Provider to the next.<br><br>o Example: The MATL tie sells 300MW of the 315MW TTC as Firm, or 95% of TTC as Firm Transmission.<br><br>o BC Hydro sells 480MW of the 1200MW TTC as Long Term Firm, and another 210MW as Long Term Conditional Firm for a total of 690MW of 1200MW, or 58% TTC as Firm Transmission.<br><br>o Is BC Hydro's 690MW of Firm Transmission as, or more reliable than MATL's 300MW Firm Transmission?<br><br>**3. Subsection 3(2)(d): "**~~**Prior to LSSI arming**~~**"**<br><br>- There was extensive stakeholder dialogue throughout the CMD process regarding the inclusion of LSSI arming within intertie space.<br><br>- Based on that dialogue, Powerex feels it should be included in the calculation of available transfer capability. |
| **Transfer Path Limits Calculation**<br><br>~~**3(3) The ISO may, in the event that the ISO determines that the methodology for determining the transfer path limits in subsection 3(2) is no longer representative, apply an alternative methodology**~~ | **Subsection 3(3): The AESO's proposed Subsection 3(3) is unclear and not warranted**<br><br>- The AESO has not provided any rationale as to why subsection 3(3) is required.<br><br>- Subsection 3(3) implies subsection 3(2) can be amended at any point in time without going through the required AUC rule amendment process.<br><br>- Powerex requests that the AESO remove subsection 3(3) from Section 201.13 |

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***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 Section 201.13, *Capacity Market Clearing* relates to the capacity market and why or why not | |
| 2 | whether you agree that Section 201.13, *Capacity Market Clearing* 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 Section 201.13, *Capacity Market Clearing* and whether, in your view, Section 201.13, *Capacity Market Clearing* meets the objective or purpose | |
| 4 | how, in your view, Section 201.13, *Capacity Market Clearing* affects the performance of the capacity market and the electricity market | |
| 5 | your views on any analysis conducted or commissioned by the AESO supporting Section 201.13, *Capacity Market Clearing* | |
| 6 | whether you agree with Section 201.13, *Capacity Market Clearing* 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 Section 201.13, *Capacity Market Clearing* | |
| 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 | |
| 10 | whether you have any additional comments | |

# Stakeholder Comment Matrix

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

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|---|---|---|---|---|---|
| **Period of Comment:** | October 26, 2018 | through | November 14, 2018 | **Contact:** | Clarke Lind |
| **Comments From:** | Powerex Corp | | | **Phone:** | 604-891-6034 |
| **Date [2018/11/08]:** | | | | **Email:** | Clarke.lind@powerex.com |

***Please include any suggestions for alternative rule wording and accompanying rationale in the table below. Cut and paste the existing rule wording into column one below and track in your changes.***

| Blackline of Suggested Rule Wording | Rationale |
|---|---|
| **Asset-Specific Reference Price for an Import Source Asset**<br><br>6 The ISO must set the asset-specific reference price for each import source asset for each settlement interval as an amount equal to:<br><br>(a) MidC (on peak) + min(100,3 x midC(on peak)) if the expected supply cushion selected for the settlement interval under subsection 2(2)(d) is 1,000 MW or greater;<br><br>Where:<br><br>(b) MidC (on peak) + min(100,6 x midC(on peak)) if the expected supply cushion selected for the settlement interval under subsection 2(2)(d) is 50 MW or greater and less than 1,000 MW;<br><br>(i) 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;<br><br>Or<br><br>(ii) The most recently published MidC (on peak) price, if the same day as the energy market in Alberta is a Sunday, or a NERC holiday.<br><br>(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(1)(d) is less than 250 MW. | The current proposed rule does not account for Sundays and NERC holidays, where there is no MidC (on peak) price. During these times, the most recently published MidC (on peak) price represents the most relevant reference price. For a Sunday, this typically means using the prices published on the previous Friday that traded for the Monday On-Peak price. |

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***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 Section 203.5, *Energy Market Mitigation* relates to the capacity market and why or why not | |
| 2 | whether you agree that Section 203.5, *Energy Market Mitigation* 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 Section 203.5, *Energy Market Mitigation* and whether, in your view, Section 203.5, *Energy Market Mitigation* meets the objective or purpose | |
| 4 | how, in your view, Section 203.5, *Energy Market Mitigation* affects the performance of the capacity market and the electricity market | |
| 5 | your views on any analysis conducted or commissioned by the AESO supporting Section 203.5, *Energy Market Mitigation* | |
| 6 | whether you agree with Section 203.5, *Energy Market Mitigation* 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 Section 203.5, *Energy Market Mitigation* | |
| 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 | |
| 10 | whether you have any additional comments | |

# Stakeholder Comment Matrix

## Proposed Amended ISO rule –Section 203.6, *Market Requirements for Interchange Transactions*

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| **Period of Comment:** | October 26, 2018 | through | November 14, 2018 | **Contact:** | Clarke Lind |
| **Comments From:** | Powerex | | | **Phone:** | 604.891.6034 |
| **Date [2018/11/09]:** | | | | **Email:** | |

***Please include any suggestions for alternative rule wording and accompanying rationale in the table below. Cut and paste the existing rule wording into column one below and track in your changes.***

| Blackline of Suggested Rule Wording | Rationale |
|---|---|
| **Submission of E-tags by Pool Participants**<br>4(2) A pool participant that submits an offer or bid for a settlement interval must comply with the following:<br>(a) submit an e-tag ~~only~~ pursuant to a dispatch that the ISO issues for an offer priced between $0.01 and $999.99 and a bid priced between $0.00 and $999.98;<br>(b) submit or adjust an e-tag as soon as reasonably practicable upon receipt of or continuation of a dispatch;<br>(c) ensure that the e-tag is aligned with the dispatch volume for energy or ancillary services; and<br>(d) take all actions required to ensure that the start of the schedule in the e-tag begins as soon as reasonably practicable, but no earlier than the effective time of the dispatch and no later than 40 minutes after the instruction time of the dispatch. | So long as there are no negative impacts to competition, E-tags should be allowed to be submitted prior to being dispatched.<br>This will allow pool participants to reduce the administrative cost and reduce compliance risk associated with in-the-hour dispatch of interties.<br>The details on how to submit an E-tag pre-dispatch without negatively impacting competition is best established via stakeholder engagement. |
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***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 Section 203.6, *Market Requirements for Interchange Transactions* relates to the capacity market and why or why not | |
| 2 | whether you agree that Section 203.6, *Market Requirements for Interchange Transactions* 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 Section 203.6, *Market Requirements for Interchange Transactions* and whether, in your view, Section 203.6, *Market Requirements for Interchange Transactions* meets the objective or purpose | |
| 4 | how, in your view, Section 203.6, *Market Requirements for Interchange Transactions* affects the performance of the capacity market and the electricity market | |
| 5 | your views on any analysis conducted or commissioned by the AESO supporting Section 203.6, *Market Requirements for Interchange Transactions* | |
| 6 | whether you agree with Section 203.6, *Market Requirements for Interchange Transactions* 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 Section 203.6, *Market Requirements for Interchange Transactions* | |

| 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 | |
| 10 | whether you have any additional comments | |

# Stakeholder Comment Matrix

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

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| **Period of Comment:** | October 26, 2018 | through | November 14, 2018 | **Contact:** | Clarke Lind |
| **Comments From:** | Powerex Corp. | | | **Phone:** | 604.891.6034 |
| **Date [2018/11/13]:** | | | | **Email:** | |

***Please include any suggestions for alternative rule wording and accompanying rationale in the table below. Cut and paste the existing rule wording into column one below and track in your changes.***

| Blackline of Suggested Rule Wording | Rationale |
|---|---|
| | General Comment:<br>Section 206.3 is confusing and difficult to understand for Import Assets. Section 2 (Uniform capacity value calculation for an import capacity asset) within Information Document 206.3, identifies the Methodology for hours not in the historical data set (2.1), as well as the Methodology for hours in the historical data set (2.2). Section 2 from ID 206.3 is clear and simple to follow but it is not clear how the rule translates to the ID. |
| **Methodologies for Hours not in an Asset's Historical Data Set**<br>7(1) The ISO must, subject to subsections 7(2) through 7(4), calculate a uniform capacity value for an asset as follows:<br>……..<br>~~(2) The ISO must calculate a uniform capacity value for an import asset by multiplying the value declared in accordance with Section 206.1 of the ISO rules, Qualification of Capacity by a derate factor that reflects number of hours in the asset's historical data set where the applicable transfer path was out of service with an available transfer capability of 0 MW.~~ | Issues with subsection 7(2):<br>Powerex does not understand the rationale for subsection 7(2).<br>The AESO's proposed Transfer Path Limit Calculation (Section 201.13.3(2)) already incorporates the transfer path's availability. All hours in which the transfer path available transfer capability was 0 MW has been factored into the Transfer Path Limit Calculation.<br>Therefore, Powerex believes subsection 7(2) is an unnecessary step taken by the AESO. |
| **Methodologies for Hours in an Asset's Historical Data Set**<br>**6(3) The ISO must calculate a uniform capacity value for an import asset as follows:**<br>(a) calculate the hourly availability factor for each hour in the asset's historical data set in | Powerex requests the AESO to define '**Available capability**' for an import asset. ID 206.3 is helpful but the rule needs to be more clear.<br>Powerex requests the AESO define '**long term firm transmission**' for an import asset. (Note - Powerex |

| Blackline of Suggested Rule Wording | Rationale |
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| accordance with the following formula:<br>(i) hourly availability factor t is the availability factor for hour t;<br>(ii) min {availability factor, long term firm transmission} t is the lesser of the sum of the import asset's **available capability** and the import asset's long term firm transmission capacity over the applicable transfer path in hour t; and<br>(iii) long term firm transmission is the import asset's **long term firm transmission** capacity over the applicable transfer path to the Alberta border. | submitted this same request within Section 201.13) |
| **Methodologies for Hours in an Asset's Historical Data Set**<br>6(1) The ISO must, subject to subsections 6(2) through 6(8) calculate a uniform capacity value for an asset as follows:<br>……<br>(7) The ISO must calculate a uniform capacity value for an asset with incremental capacity in accordance with the following formula:<br>(a) performance factor is:<br>(i) the average availability factor or average capacity factor calculated in accordance with subsection 6, as applicable;<br>~~(ii) in the case of an import asset, the average availability factor calculated according to subsection 6(3)(b) derating the value declared, in accordance with Section 206.1 of the ISO rules, Qualification of Capacity, to reflect the hours in the 1250 hours determined in accordance with subsection 3 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.~~ | The same comment submitted for subsection 7(2) above applies to subsection 6(1)(7)(ii).<br>Powerex believes subsection 6(1)(7)(ii) is an unnecessary step taken by the AESO. |
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***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 Section 206.3, *Uniform Capacity Value Determination* relates to the capacity market and why or why not | |
| 2 | whether you agree that Section 206.3, *Uniform Capacity Value Determination* 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 Section 206.3, *Uniform Capacity Value Determination* and whether, in your view, Section 206.3, *Uniform Capacity Value Determination* meets the objective or purpose | |
| 4 | how, in your view, Section 206.3, *Uniform Capacity Value Determination* affects the performance of the capacity market and the electricity market | |
| 5 | your views on any analysis conducted or commissioned by the AESO supporting Section 206.3, *Uniform Capacity Value Determination* | |
| 6 | whether you agree with Section 206.3, *Uniform Capacity Value Determination* 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 Section 206.3, *Uniform Capacity Value Determination* | |

| 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 | |
| 10 | whether you have any additional comments | |

# Stakeholder Comment Matrix

## Proposed New ISO rule –Section 206.8, *Obligation Period Performance Assessments*

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| **Period of Comment:** | October 26, 2018 | through | November 14, 2018 | **Contact:** | Clarke Lind |
| **Comments From:** | Powerex | | | **Phone:** | 604.891.6034 |
| **Date [2018/11/01]:** | | | | **Email:** | Clarke.Lind@powerex.com |

***Please include any suggestions for alternative rule wording and accompanying rationale in the table below. Cut and paste the existing rule wording into column one below and track in your changes.***

| Blackline of Suggested Rule Wording | Rationale |
|---|---|
| **Delivery Assessments:**<br><br>**11(1)** The **ISO** must, as soon as practicable in the **settlement period** following each delivery hour established in subsection 3(2), identify an asset's delivery volume in MWh during each of the delivery hours as follows:<br><br>(e) for an import asset, delivery volume is ~~the lesser of~~:<br><br>(i) ~~the long term firm transmission capacity associated with the import asset; or~~<br><br>(ii) the sum of:<br><br>(a) The volume of ~~in a~~ valid e-tags;<br><br>(b) where the **offer** price is greater than or equal to $0.01/ MWh and the asset is subject to the limits referenced in Section 303.2 of the **ISO rules**, *Available Transfer Capability*, the volume in the **offer** during the first 2 delivery hours where the asset is subject to the limits. | **Issues with proposed rule 11(1)(e) – Delivery Assessment for Import Asset:**<br><br>**Rationale for striking out Subsection 11(1)(e)(i):**<br><br>The AESO's CMD final incents system reliability during times of system stress by offering high energy prices and performance incentives to resources. These two revenue streams collectively help to incent reliability. The AESO has included a large volume of import energy, which far exceeds the interties' Transfer Path Capability, within Alberta's Resource Adequacy Requirement. However, subsection 11(1)(e) limits an import asset's Delivery Assessment to the Market Participant's firm transmission capacity. If an import asset with a Capacity Commitment provided energy beyond its firm transmission capacity, why should the import asset not receive a performance incentive? The additional energy the import asset has provided is critical during an EEA event.<br><br>The proposed Delivery Assessment for an Import asset ((11(1)(e)) represents asymmetric treatment of internal and external resources, without justification. The Delivery Assessment for an internal asset (subsection 11(1)(a)), states that an internal asset's delivered volume will be based on the asset's metered energy, or volume provided in accordance with Sections 205.4, 205.5~~.~~ or 205.6. The same Delivery Assessment should be applied to import assets.<br><br>**Rationale for changes to Subsection 11(1)(e)(ii)(a) [e-tags]:**<br><br>An import asset can have multiple e-tags. One or multiple e-tags may be associated with the import asset's Capacity Commitment. Further, one or multiple e-tags could be associated with additional energy, above the import asset's Capacity Commitment, along the flow path. The Delivery Assessment for import assets (rule 11(1)(e)) should be based on all e-tags along the transfer path |

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| | from that import asset within that hour. |
| **Availability Assessment:**<br>**7(1)** The **ISO** must, as soon as practicable after an **obligation period**, identify the asset's availability volume in MWh during each of the availability hours identified in subsection 2 as follows:<br>(f) for an import asset, availability volume is the **available capability** for that **settlement interval** ~~capped at the volume of long term firm transmission **capacity** for the asset~~ subject to a **capacity commitment**. | **Rationale for changes to Subsection 7(1)(f):**<br>The same issues identified by Powerex in subsection 11(1)(e), apply to the Availability Assessment for an Import Asset (7(1)(f)).<br>If the import asset is capable of providing energy beyond its firm transmission capacity, why should the import asset not receive an Availability incentive? This additional import energy volume is important during Alberta's tightest 250 supply cushion hours.<br>The AESO is including the additional import capability within its Resource Adequacy model. Therefore, if the import asset performs at a level greater than its firm transmission, it should be eligible for performance incentives. |
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| Submit to: rules_comments@aeso.ca | |
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***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 Section 206.8, *Obligation Period Performance Assessments* relates to the capacity market and why or why not | |
| 2 | whether you agree that Section 206.8, *Obligation Period Performance Assessments* 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 Section 206.8, *Obligation Period Performance Assessments* and whether, in your view, Section 206.8, *Obligation Period Performance Assessments* meets the objective or purpose | |
| 4 | how, in your view, Section 206.8, *Obligation Period Performance Assessments* affects the performance of the capacity market and the electricity market | |
| 5 | your views on any analysis conducted or commissioned by the AESO supporting Section 206.8, *Obligation Period Performance Assessments* | |
| 6 | whether you agree with Section 206.8, *Obligation Period Performance Assessments* 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 Section 206.8, *Obligation Period Performance Assessments* | |

| 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 | |
| 10 | whether you have any additional comments | |