

<p>Period of Comment: October 26, 2020 through November 9, 2020</p> <p>Comments From: Heartland Generation Ltd. ("Heartland Generation")</p> <p>Date [yyyy/mm/dd]: 2020/11/09</p>	<p>Contact: Kurtis Glasier</p> <p>Phone: (587) 228-9617</p> <p>Email: Kurtis.Glasier@heartlandgeneration.com</p>
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Instructions:

1. Please fill out the section above as indicated.
2. Please refer back to the *Letter of Notice for Feedback on the Content of Proposed Options for Amended Section 505.2* under the "Related Materials" section to view the actual draft proposed materials on amended Section 505.2.
3. Please respond to the questions below and provide your specific comments, proposed revisions, and reasons for your position underneath (if any). Blank boxes will be interpreted as favourable comments.
4. Please be advised that general comments do not give the AESO any specific issue to consider and address, and results in a general response.

Item #		Stakeholder comments
1	Please comment on the stakeholder session hosted on October 8, 2020. Was the session valuable? Was there something the AESO could have done to make the session more helpful?	<p>The stakeholder session was valuable and informative; however, the AESO could have made the session more helpful by providing the complete draft rules beforehand. The AESO did present the options and some draft language, but Heartland Generation would have appreciated complete drafts of the rules themselves prior to the stakeholder session.</p> <p>Given the limited time and information regarding the proposed ISO Rules, a second stakeholder session would be valuable.</p>

Item #		Stakeholder comments
2	Which option do you prefer and why?	<p>Heartland Generation prefers option 2, as it is both more consistent with the purpose of the GUOC and, unlike option 1 and the status quo, is technology agnostic. Both option 1 and the status quo target generator performance based on fuel type using pre-defined targets set by the ISO Rule that can result in arbitrary and discriminatory treatment between assets. Option 2 removes this possibility, while remaining administratively simple and allows for future generation technology to be included with minimal or no amendments.</p>
3	Do you have any concerns with the option you chose?	<p>In the draft rule subsection 3(2) the formula includes the absolute value of critical maximum capability and energized maximum capability, as follows:</p> $\text{penalty factor} = \frac{\text{ABS}(\text{critical maximum capability} - \text{energized maximum capability})}{\text{critical maximum capability}}$ <p>This formula would result in a penalty factor for a generating unit whose energized maximum capability exceeds its critical maximum capability. This outcome appears to contradict the language in 3(2), which states that a penalty factor will only be assessed to a generating unit if its energized maximum capability is less than its critical maximum capability.</p> <p>Therefore, the AESO should review if its intent with the amended rule is to penalize generators for exceeding their critical maximum capability. For example, the current draft of the rule would penalize a generator that is over its critical maximum capability by 10% the same as a generator that is under it by 10%.</p> <p>To be consistent with the intent of the language in subsection 3(2), Heartland Generation therefore suggests that the “absolute value” function in the numerator be changed to a “maximum value” function between critical maximum capability minus energized maximum capability and zero (i.e. MAX((critical maximum capability – energized maximum capability), 0)).</p> <p>Further, Option 2 would benefit from the AESO including an illustrative example(s) that would show the calculation and the outcome it intends to achieve. This example could easily be re-purposed into a future Information Document relating to the ISO Rule.</p>

Item #		Stakeholder comments
4	Do you have any concerns with the option you did not choose?	<p>Option 1 results in discriminatory treatment between asset types because their availability assessment depends on pre-defined targets set within the ISO Rule. For example, a wind asset that is available 25% or a solar plant that is available only 12% would recover all of their GUOC, whereas a traditional thermal generator would need an availability of 80% to do so. These different standards open the door to unfair treatment as thermal generators must perform to a higher standard; option 2 removes this possibility, as each generator would be held to individually nominated maximum capabilities and have the same methodology and standard assessed regardless of fuel type.</p>
5	Any additional comments regarding the proposed amended Section 505.2?	<p>Heartland Generation does not have any further comments.</p>

Please provide any additional comments or views on the type of content that should be included in an information document associated with the proposed amended Section 505.2