

## Stakeholder Comment Matrix – January 5, 2021

### Development of Proposed Amendments to Section 202.6 of the ISO rules, *Adequacy of Supply* (“Section 202.6”)



<b>Period of Comment:</b> January 5, 2021 through January 22, 2021	<b>Contact:</b> Akira Yamamoto
<b>Comments From:</b> TransAlta Corporation	<b>Phone:</b> 403-267-7304
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#### Instructions:

1. Please fill out the section above as indicated.
2. Please refer back to the Letter of Notice under the “Related Materials” section to view related materials.
3. Please respond to the questions below and provide your specific comments (if any). Blank boxes will be interpreted as favourable comments.

***The AESO is seeking comments from Stakeholders on the development of proposed amendments to Section 202.6 of the ISO rules, Adequacy of Supply, with regard to the following matters:***

Stakeholder Comment Matrix – January 5, 2021

Development of Proposed Amendments to Section 202.6 of the ISO rules, *Adequacy of Supply*  
("Section 202.6")



Development of a Proposed ISO Rule

Stakeholder Comments and/or Alternate Proposal



<p>1.</p>	<p>Do you agree or disagree that the issue identified requires the development of proposed amendments to Section 202.6? Please comment.</p>	<p><b><i>The supply adequacy forecast is used by participants to make unit commitment decisions that could impact system reliability</i></b></p> <p>TransAlta does not agree with the removal of the details of how it performs its Supply Adequacy Forecast. While it may be true that the AESO finds no value in producing the supply adequacy forecast or providing transparency in the way the supply adequacy forecast is developed, the forecast is used by market participants to make commitment decisions that could ultimately impact system reliability.</p> <p><b><i>The rule requirements should remain to ensure the Supply Adequacy Forecast is produced in accordance with a prescribed and transparent methodology</i></b></p> <p>The AESO states an issue that it is attempting to address is that the adequacy assessment methodology needs to be revised to consider certain inputs including removing the exclusion of wind and solar from the assessments. It is unclear how removing any obligation upon the AESO to consider these inputs through the entire removal of the requirement to perform adequacy assessments addresses this issue. In fact, the AESO, by removing any obligation upon itself to consider these inputs is relieving itself from any obligation to produce a better and more reliable adequacy assessment.</p> <p>Section 202.6 provides a clear and transparent methodology that the AESO must adhere to and obligation for it to perform these important assessments for market participants. This is precisely the detail and transparency required for market participant to understand and interpret the Supply Adequacy Forecast so that they can make rational market decisions that support the reliable operation of the system.</p> <p>The AESO should only make revisions to the rule that clarify how the inputs that need to be revised will be incorporated into the assessment. In any event, the AESO plans to continue to produce Supply Adequacy Forecasts so there is no real relief in terms of administrative burden with retaining the substance of the rule and amending the methodology to account for its deficiencies. The AESO should not pursue changes that eliminate its obligations to perform the assessment or specify the methodology that it must follow to perform these assessments.</p>
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	Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
2.	Do you agree or disagree with the potential objective or purpose of proposed amendments to Section 202.6? Please comment.	<p><b><i>The AESO’s duty to direct the reliable and economic operation of the system is not met if market participants are deprived important information to make self-commitment decisions</i></b></p> <p>An important feature of the Alberta market design is that generators must make self-commitment decisions. This is a significant and meaningful difference from other markets that have other mechanisms to address these such as through day ahead markets or scheduling process and Reliability Unit Commitment. We further note that even when there are other mechanisms to address unit commitment, ISOs still provide significant and detailed information to understand future period supply adequacy.</p> <p>No market participant wishes to make a self-commitment decision that could imperil the reliability of the system. The Supply Adequacy Forecast provides important information that informs a market participants decision with respect to shutting down long lead time assets in response to weak real time prices such that the potential consequences to system supply adequacy can be properly considered.</p>
3.	Do you agree or disagree with the proposed form of consultation and timelines? Please comment.	The proposed consultation (by way of written process) and timeline are reasonable.
4.	Do you have any additional comments?	<p><b><i>More transparency should be provided about what the Supply Adequacy Forecast assumes for price responsive load and long lead time assets</i></b></p> <p>TransAlta asks for more clarity about how price responsive loads are considered in the load forecasts as well as how long lead time assets are accounted for in the adequacy forecast. This information is needed to fully understand what the adequacy forecast is presenting and how changes in these parameters may affect the forecast result. It would be helpful if the AESO describes how the Supply Adequacy Forecast currently models these and describe any changes that it will make to these assumptions, if any.</p>