

<p>Period of Comment: October 14, 2020 through October 29 , 2020</p> <p>Comments From: TransAlta Corporation</p> <p>Date: 2020/10/29</p>	<p>Contact: Akira Yamamoto</p> <p>Phone: 403-267-7304</p> <p>Email: akira_yamamoto@transalta.com</p>
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Instructions:

1. Please fill out the section above as indicated.
2. Please refer back to the Consultation Letter under the “Attachments” section to view materials related to the development of amendments to Section 306.7 of the ISO rules, *Mothball Outage Reporting* (the “Mothball rule”).
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 amendments to the Mothball rule with regard to the following matters:

	Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
1.	Do you agree or disagree that the issues identified require the development of an amended Mothball rule and a review of the broader framework for removing generating capacity from the market? Please comment.	<p><i>There is no need at this time for a review of the broader framework.</i></p> <p>TransAlta disagrees with a review of the broader framework for removing generating capacity from the market. We are not are of any issues with the current practices of retirement of assets.</p> <p><i>We support a reduction of the requirements for the reporting of mothball outages.</i></p> <p>TransAlta may agree with amendments to the Mothball rule in the context of the red tape reduction initiative. There are many aspects of the mothball rule including the notification timelines, maximum duration, and return to market timelines that are overly restrictive. However, we do not supportive a consultation that would result in even more onerous requirements being imposed on mothball outages.</p>

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2.	<p>Do you agree or disagree with the potential objectives or purpose of the review of the Mothball rule and a review of the broader framework for removing generating capacity from the market? Please comment.</p>	<p><i>There is no purpose or objective that suggests this should be pursued at this time.</i></p> <p>We view the AESO’s proposed objectives and purpose of the Mothball rule consultation as overly broad, unfocused, and lacking any identification of real issues with the mothball rule that would warrant a need to consult at this time.</p> <p>While we appreciate that the mothball rule was an expedited filing and further consultation was started but then delayed due to the capacity market design, we question whether consulting on this matter during a pandemic and a difficult economic recovery is the appropriate priority to assign to this initiative or an effective use of resources.</p> <p>We believe the AESO’s priorities should be set on issues that will support the economic recovery. If the scope of this proceeding is focused on reducing the burdens of the mothball rule and reducing its requirements, we could support it. We fail to understand how, in its present form, this consultation could positively contribute to the flexibility required to meet the economic challenges ahead.</p>
3.	<p>Do you agree or disagree with the proposed form of consultation? Please comment.</p>	<p><i>Six stakeholder sessions are too long.</i></p> <p>No, we do not agree that this consultation should be six stakeholder consultations long. That number of stakeholder consultation sessions is greater than any other initiative that the AESO has consulted on in the past two years since the capacity market work. Furthermore, we are struggling to understand the AESO’s overall planning, which sees more time being spent with stakeholders on the mothball rule than tariff modernization – arguably the most important initiatives that the AESO is currently working on. At the very least, the proposed consultation appears disproportionate lengthy.</p> <p>If the AESO does pursue this consultation, we support the use of online sessions.</p>

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4.	Do you intend to participate in any related consultation? OR Do you agree that no consultation group is required for this rule development? Please comment.	Yes, TransAlta will participate in any related consultation that stands to impact market rules to which we are subject to. As mentioned above, we do not agree with the AESO's proposed purpose or objective but if the aim is to reduce red tape we would support a consultation group for the amendments to the rule.
5.	Do you agree or disagree that the development of proposed amendments to the Mothball rule should proceed at this time?	No, we do not support a broad scope mothball rule consultation at this time.
6.	Do you have any additional comments?	No additional comments at this time.