

Proposed Amendments to the Financial Settlement Rules

Date of Request for Comment:	February 25, 2021
Period of Comment:	February 25, 2021 through March 18, 2021

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1.	Do you agree or disagree that the issue identified in the letter of notice requires the proposed amendments to the Financial Settlement Rules? Please comment.	<p><u>Capital Power Corporation (“Capital Power”)</u></p> <p>1. While Capital Power is generally supportive of removing unnecessary or duplicative requirements and reducing overall administrative burden, the AESO’s proposed changes appear focused on reducing its own obligations, many of which market participants rely on.</p> <p>While the financial settlement rules may be aligned with business processes and practices, having such processes articulated in the rules provide the stability and certainty that market participants expect.</p>	<p>1. The AESO is proposing to remove the requirements that it considers to be non-material, obsolete, or redundant from Section 103.4 of the ISO rules, <i>Power Pool Financial Settlement</i> (“Section 103.4) and Section 103.6 of the ISO rules, <i>ISO Fees and Charges</i> (“Section 103.6”). The AESO will continue to perform many of the non-material requirements as part of its standard business practices.</p> <p>The AESO wishes to remind market participants that there continues to be overarching legislation that governs the AESO’s conduct. The AESO is required to carry out its duties, responsibilities and functions in a timely manner that is fair and responsible to provide for the safe, reliable and economic operation of the interconnected electric system and to promote a fair, efficient and openly competitive electricity market for electricity, in accordance with the <i>Electric Utilities Act</i> (the “EUA”). The overarching legislative requirements in the EUA ensure that the AESO will not seek to abandon or revise its standard business practices in a manner that would result in any significant risk to the stability of the electricity market.</p> <p>Removing non-material requirements from Section 103.4 and Section 103.6 will also allow the AESO to respond and adapt its business practices to</p>

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			<p>changes in the industry in an efficient manner by reducing the amount of consultation and Alberta Utilities Commission (the “Commission”) process required for future non-material changes. This regulatory efficiency will benefit both the AESO and market participants.</p> <p>In alignment with the Government of Alberta’s red tape reduction initiative, the AESO is committed to reducing regulatory requirements imposed on both the AESO and market participants. In determining which regulatory requirements are appropriate to propose for removal, the AESO must consider and balance a number of factors, including impacts to reliability and the electricity market, regulatory burden, costs, transparency, and the Government’s red tape reduction targets. Often, achieving gains in one of these areas results in a trade-off in another area. The AESO takes these matters seriously and works diligently to maximize the benefits associated with proposed changes.</p>
		<p><u>ENMAX Corporation (“ENMAX”)</u> See additional comments below.</p>	
		<p><u>Heartland Generation Ltd. (“Heartland Generation”)</u> 2. In general, Heartland Generation is supportive of the broad initiative to reduce regulatory “Red Tape” in the electricity market. However, some of the proposed amendments may be sacrificing necessary transparency in order to reduce superficial regulatory burden.</p>	<p>2. Please see the AESO’s response #1. In addition, the AESO believes providing additional information in an information document will ensure the current level of transparency for market participants is kept.</p>
		<p><u>TransAlta Corporation (“TransAlta”)</u> 3. <i>The AESO’s proposed red tape reduction will</i></p>	<p>3. Please see the AESO’s response #1.</p>

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		<p><i>increase the burden and uncertainty for market participants.</i></p> <p>The AESO proposed red tape reduction only relieves itself of obligations with no consideration of the impacts to market participants.</p> <hr/> <p><u>TransCanada Energy Ltd. (“TCE”)</u></p> <p>4. TCE supports the government of Alberta’s red-tape reduction initiative and the work the AESO is doing to reduce regulatory requirements. TCE submits that the intent of this initiative is to improve the efficiency of the electricity market, which is best achieved by reducing the regulatory requirements facing market participants. Reducing the AESO’s regulatory requirements should be the secondary focus of the initiative as this is less likely to provide significant efficiency benefits.</p> <p>TCE does not support the removal of requirements on the basis that they have become “standard business activities” even if they are transferred to an information document. Transferring such requirements to an information document opens the door for the AESO to subsequently amend or remove the requirement without consultation or Alberta Utility Commission (“Commission”) oversight. Moreover, TCE questions whether transferring requirements from a Rule to an information document, particularly when market participants rely upon such requirements, are consistent with the intent of the red-tape reduction initiative.</p> <p>However, TCE does support the removal or streamlining of requirements that are redundant or obsolete.</p>	<p>4. Please see the AESO’s response #1.</p>
2.	Do you agree or disagree with the potential purpose of the	<p><u>Capital Power</u></p> <p>The AESO’s purpose is appears to highlight three</p>	

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	<p>proposed amendments to the Financial Settlement Rules? Please comment.</p>	<p>primary objectives.</p> <p>5. First, Capital Power appreciates that over-time drafting styles will evolve and typographical errors will be uncovered. By addressing these minor amendments only when reviewing a rule provides efficiencies which are appreciated.</p> <p>6. Secondly, Capital Power would note that substantive changes are mixed between red tape reduction and introducing new aspects of the rule. Capital Power would note that additional detail would be beneficial to better understand the AESO’s intent with these changes, particularly for amendments highlighted in section 3 below.</p> <p>7. Finally, Capital Power would note that the AESO’s reduction in regulatory requirements appears focused on their own obligations and does not appear to meaningfully reduce red-tape on market participants.</p>	<p>5. The AESO acknowledges Capital Power’s comment.</p> <p>6. The AESO acknowledges Capital Power’s comment. Please see the AESO’s responses #19 – 24.</p> <p>7. Please see the AESO’s response #1.</p>
		<p><u>ENMAX</u> See additional comments below.</p>	
		<p><u>Heartland Generation</u> 8. Heartland Generation does not disagree with the broad intent or purpose of the proposed amendments, except for those identified in response to question 4 regarding the reduction of regulatory requirements and the clarity on the interest calculation.</p>	<p>8. The AESO acknowledges Heartland’s comment. Please see the AESO’s responses to Heartland’s comments throughout the response matrix.</p>

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		<p><u>TransAlta</u></p> <p>9. Section 18: Preliminary Power Pool Statements should not be removed.</p> <p>TransAlta does not agree that the requirements in section 18 for the ISO to issue preliminary power pool statements should be removed. The process of preliminary to final statements is a key validation and verification process for market participants. The entire removal of this process relieves the AESO of any obligation to provide preliminary power pool statements and creates unnecessary process uncertainty and red tape for market participants. The process clarity provided through this section of the rule allowed market participants to design their internal processes with confidence about the requirements and timing expectations on the AESO.</p>	<p>9. Based on Stakeholder feedback, the AESO has decided to continue to include requirements related to the preliminary power pool statement in Section 103.4.</p> <p>The AESO has incorporated the preliminary power pool statement requirements as follows:</p> <p>Final Pool Statement</p> <p>17(1) The ISO must issue on the AESO website:</p> <ul style="list-style-type: none"> (a) a preliminary power pool statement on the 5th business day after the last day of each settlement period; and (b) a final power pool statement on the 15th business day after the end of each settlement period, <p>to each pool participant. No later than the close of business day on the 15th business day after the end of each settlement period, the ISO must issue on the AESO website a final power pool statement to each pool participant containing the line items, calculations and amounts set out in the preliminary power pool statement and determined on:</p> <ul style="list-style-type: none"> (a) an initial basis for that settlement period; (b) an interim basis for the 2 months prior to that settlement period; and (c) a final basis for the 4 months prior to that settlement period. <p>(2) The ISO must include the following line items on</p>

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			<p>the preliminary and final power pool statements:</p> <ul style="list-style-type: none"> (a) the amount of energy a pool participant purchases and supplies and the payment calculation for that energy determined on: <ul style="list-style-type: none"> (i) an initial basis for that settlement period; (ii) an interim basis for the 2 months prior to that settlement period; and (iii) a final basis for the 4 months prior to that settlement period; (b) the energy market trading charge amount allocable to the pool participant as calculated in accordance with subsection 5 of Section 103.6 of the ISO rules, ISO Fees and Charges; (c) any payment default charge amount allocable to the pool participant as calculated in accordance with subsection 7 of Section 103.6 of the ISO rules, ISO Fees and Charges, including details regarding the calculation of the payment default charge as allocated to that pool participant, or any refund of that default charge amount; (d) any other ISO fees and charges under Section 103.6 of the ISO rules, ISO Fees and Charges, including the pool participation fee, digital certificate charges, and records and data provision charges; (e) any interest, late payment or other costs



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		<p>10. Dispute processes should contemplate how financial settlement disputes comport with Section 103.2: Dispute Resolution.</p> <p>We are not clear if the dispute process contemplated within this rule are considered separate and distinct process from Section 103.2: Dispute Resolution. We ask the AESO to consider providing greater guidance to market participants if a dispute under Section 103.4 is also a dispute under Section 103.2 or if a dispute under section 103.2 can ultimately be advance in a secondary process under section 103.4.</p>	<p>or charges under Section 103.7 of the ISO rules, <i>Financial Default and Remedies</i>;</p> <p>(f) the net amount either owing to or by the pool participant; and</p> <p>(g) such other information as the ISO considers appropriate.</p> <p>10. The dispute process referred to in Section 103.2 is the formal dispute process for market participant. However, the simplified dispute resolution process in proposed amended Section 103.4 directly relates to issues with the pool statement.</p> <p>The AESO will include guidance in information document <i>ID #2011-002R Power Pool Settlement Guide</i>.</p>
		<p><u>TCE</u></p> <p>11. For the reasons expressed in #1 above, TCE submits that some of the proposed amendments do not meaningfully reduce or streamline regulatory requirements (see #4 below for more detail). This may be achieved for those proposed amendments that remove redundant or obsolete requirements. Enabling electronic funds transfer is welcome and is likely to improve efficiencies.</p> <p>12. The AESO states that it has proposed amendments that will “clarify the interest calculation”. Yet, in the proposed subsections 15(2) and 18(7), it appears that the AESO is introducing a new interest charge and a</p>	<p>11. Please see the AESO’s response #1.</p> <p>12. The interest charge and mechanism to withhold payment are only intended to apply to situations involving a serious contravention by a market participant of the legal requirements relating to</p>

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		<p>new mechanism to withhold payment. TCE requests that the AESO confirm that these proposed changes are new rather than clarifications. If not confirmed, please explain how these are clarifications.</p>	<p>metering, such as AUC Rule 021, <i>Settlement System Code Rules</i> (“AUC Rule 021”). For example, it would include the submission of falsified metering data by a market participant to the AESO. These types of situations occur very rarely.</p> <p>The proposed amendments in subsections 15(2) and 18(7) of Section 103.4 are <u>not</u> intended to apply to mere technical errors or adjustments to metering data that occur in the ordinary course. Technical errors or adjustments will continue to be addressed through resettlement of prior periods and the AUC’s post final adjustment mechanism set out in AUC Rule 021. As such, the AESO does not anticipate that the proposed amendments will have an impact on the vast majority of market participants or their financial obligations.</p> <p>In the AESO’s view, these are not new requirements. The AESO has generally taken the position that it has these rights and remedies as part of its general duty under the EUA to ensure the fair and responsible financial settlement of the power pool. The AESO wishes to include these in the ISO rule to provide clarity and transparency to market participants regarding the interest rate applicable to these situations.</p> <p>Based on Stakeholder feedback, the AESO has revised subsection 18(7) for clarity as follows:</p> <p>18(7) The ISO may, notwithstanding subsection 18(4), withhold any a payments associated with erroneous metering data, to a pool participant if the ISO determines an error in metering data is the result of the pool participant’s failure to comply with applicable requirements relating to</p>

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			<p>metering, until such error is corrected by a pool participant to the satisfaction of the ISO, if the ISO determines that there is an error in the metering data as a result of the pool participant's failure to comply with applicable requirements relating to metering.</p>
3.	Do you agree or disagree with the proposed consultation and timelines? Please comment.	<p><u>Capital Power</u> 13. Capital Power believes that written consultation will suffice for the specific purpose of revisions to the financial settlement rules.</p> <p><u>ENMAX</u> 14. Agree.</p> <p><u>Heartland Generation</u> 15. Given that there are concerns regarding the proposed amendments, Heartland Generation disagrees that the consultation and timelines are sufficient. The AESO should include a process step for stakeholders to provide written comments following the AESO's written responses in April 2021. Depending on the extent of the concerns from all parties, the AESO may want to consider holding a consultation session to present to stakeholders how it plans to address those concerns.</p> <p><u>TransAlta</u> 16. No comments at this time.</p> <p><u>TCE</u> 17. The proposed consultation and timeline seems reasonable. Depending upon the AESO's response to</p>	<p>13. The AESO acknowledges Capital Power's comment.</p> <p>14. The AESO acknowledges ENMAX's comment.</p> <p>15. The AESO acknowledges Heartland's comment. The AESO believes it has addressed all of the concerns by providing additional clarity in its responses to Stakeholder feedback and by continuing to include the requirement to provide a preliminary power pool statement. Therefore, the AESO believes additional consultation is not required.</p> <p>16. The AESO acknowledges TransAlta's comment.</p> <p>17. The AESO acknowledges TCE's comment.</p>

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		TCE's request in #2 above more consultation may be needed for participants to understand the AESO's need for a new interest charge and mechanism to withhold payment.	Please see the AESO's response #12.
4.	Do you agree or disagree with the proposed amendments to the Financial Settlement Rules? Please comment.	<p><u>Capital Power</u></p> <p>Capital Power has the following comments on the specific rule amendments below:</p> <p><u>Proposed changes to Rule 103.4 Power Pool Financial Settlement</u></p> <p>18. Capital Power is supportive of the following amendments:</p> <ul style="list-style-type: none"> • Revisions enabling payment by way of electronic funds transfers (EFT) is a welcome improvement to the AESO's processes. <p>Capital Power disagrees with the subsequent amendments and suggests the following:</p> <p>19. Capital Power is concerned that removing references to producing the preliminary power pool statement (subsections 13(1-4), 16, 17, 18) could lead to potentially allowing for erroneous reporting, and modifying or removing the statement without consultation. These are used for vetting settlement and addressing any issues quickly. If preliminary statements were to be materially modified, or ceased, market participant's validation efforts would be negatively impacted and would limit the possibility of challenging any discrepancies and errors.</p> <p>20. The AESO in introducing interest provisions relating to errors in metering data has added new content to the rule. Capital Power is of the opinion that the</p>	<p>18. The AESO acknowledges Capital Power's comment.</p> <p>19. Please see the AESO's response #9.</p> <p>20. Please see the AESO's response #12.</p>

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		<p>AESO should consult further on this as errors in metering data may be out of the control of the pool participant (i.e. the result of a Meter Data Manager error) and it would be beneficial to understand the driver for what the AESO is aiming for with this addition to the rule.</p> <p>21. Capital Power suggests that under the proposed section 18 (7) addition, the wording should be reflective of the AESO only having the right to withhold an amount equal to unpaid/disputed amounts, rather than withhold entire payments to participants. Theoretically, as it stands currently, situations could arise that would pose liquidity issues for participants.</p> <p>22. Capital Power would appreciate clarification on the following amendments:</p> <ul style="list-style-type: none"> Removal of section 17 – Metering Data Submission Requirements. Removal of this section would only increase the administrative burden associated with metered data, unless the AESO looks to subsection 9.6.2.4.1 of Commission Rule 021. Capital Power believes that these terms should still be clearly stated in 103.4 to avoid any confusion, and to ensure meter data managers are following requirements. <p><u>Proposed revisions to Rule 103.6 ISO Fees and Charges</u></p> <p>23. Capital Power is supportive of the following amendments:</p> <ul style="list-style-type: none"> Capital Power is has no concerns with the AESO's 	<p>21. Please see the AESO's response #12.</p> <p>22. The AESO does not agree that removing subsection 17 of Section 103.4 will increase administrative burden or cause confusion for meter data managers as the requirements contained in this subsection are duplicative of AUC Rule 021. AUC Rule 021 requirements continue to apply to meter data managers.</p> <p>23. The AESO acknowledges Capital Power's comment.</p>

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		<p>process changes for records requests.</p> <p>24. Capital Power disagrees with the following amendments:</p> <ul style="list-style-type: none"> Removing AESO requirements to publish as schedule of fees & pool participant fees is concerning. Maintaining these requirements in the ISO rules provide certainty to market participants that these will be kept up-to-date and accurate and removal may negatively affect commercial agreements. 	<p>24. The AESO acknowledges the importance of publishing the schedule of ISO fees and Stakeholder concerns regarding removing this authoritative requirement. Therefore, the AESO has revised proposed amended Section 103.6 to keep the requirement as follows:</p> <p>2(4) The ISO must publish the <i>Schedule of ISO Fees</i> on the AESO website.</p>
		<p><u>ENMAX</u></p> <p>ENMAX remains supportive of the AESO’s efforts to reduce and streamline regulatory requirements where stable practices and processes are not compromised as a result. ENMAX submits the following comments below.</p> <p>ISO Rule 103.4, Power Pool Financial Settlement</p> <p>25. <u>Section 18, AESO Preliminary Power Pool Statements</u></p> <ul style="list-style-type: none"> ENMAX requests further clarity from the AESO on the proposed removal of Section 18. Is it the AESO’s intention to no longer provide preliminary power pool statements to pool participants? We currently use the preliminary statements in our forecasts and validation efforts and do not believe this section should be removed. <p>26. <u>Section 19, AESO Final Pool Settlement</u></p> <ul style="list-style-type: none"> The AESO is proposing to remove the majority of Section 19. Stakeholders would benefit if this section provided clarity on what reasonable efforts 	<p>25. Please see the AESO’s response #9.</p> <p>26. The AESO has reviewed the proposed revisions to subsection 19 of Section 103.4 and has revised subsection 19(4) in order to reduce the administrative burden of requiring the AESO to issue the final power pool statements via email to</p>

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		<p>will be used by the AESO to issue final power pool statements, and what options are available to stakeholders in the event they are unable to retrieve the final power pool statement from the AESO website (e.g., due to unforeseen technical issues).</p> <p>27. <u>NEW Subsection 18(7), Pool Settlement Date and Payment Obligations</u></p> <p><u>(7) The ISO may, notwithstanding subsection 18(4), withhold any payments to a pool participant until such error is corrected by a pool participant to the satisfaction of the ISO, if the ISO determines that there is an error in the metering data as a result of the pool participant's failure to comply with applicable requirements relating to metering.</u></p> <ul style="list-style-type: none"> - Can the AESO please advise whether the withholding of payments will apply only to specific hours impacted by a metering data error or for all hours in the settlement month? In ENMAX's view, withholding of payments should only apply to specific hours impacted by a metering data error. <p>28. <u>Section 23, Payment and Section 24, Repayment Procedures</u></p> <ul style="list-style-type: none"> - The specific payment methods to the ISO "by wire transfer" is being removed and replaced with "in the 	<p>all pool participants upon instances of technical issues. If a pool participant is unable to retrieve their final power pool statement from the AESO website, the pool participant may contact the AESO and a copy of the final statement will be provided via email. The AESO's contact information will be provided in an associated information document.</p> <p>19(4) The pool participant must contact the ISO to request the final power pool statement. The ISO must use reasonable efforts to issue to each pool participant the final power pool statement if the AESO website is not available on the 15th business day referred to in subsection 17(1).</p> <p>27. Please see the AESO's response #12.</p> <p>28. The AESO acknowledges ENMAX's comment and confirms that the current method of payment is acceptable unless the market participant is otherwise notified.</p>

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		<p>manner the ISO specifies”. Unless we are notified otherwise, ENMAX assumes that the current method it uses to pay the AESO remains acceptable.</p> <p>Heartland Generation</p> <p>29. Heartland Generation does not agree that the AESO should remove the requirement to publish the “Schedule of ISO Fees”. This requirement is not extraneous and provides clarity for market participants on expected fee amounts, which are otherwise not indicated by the AESO in a public format. The transparency gained by publishing the schedule of ISO fees outweighs the minimal regulatory burden on the AESO. If the AESO intends to replace this schedule with a different document, then this should be clearly indicated; to this point, Heartland Generation supports the continued inclusion of the requirement of publishing ISO fees in an authoritative document, like an ISO Rule.</p> <p>30. Also, the AESO is proposing to remove the Section 103.4, Power Pool Financial Settlement, 7(2), which indicates how to calculate transmission constraint rebalancing (TCR) payments when there is more than one operating block that is eligible. Heartland Generation suggests altering the proposed amendment for 8(1) to state:¹</p> <p>“The ISO must make a payment to a pool participant with a source asset that has delivered additional energy for transmission constraint rebalancing as per 2(2)(b)(ii) of Section 302.1 of the ISO rules, <i>Real Time Transmission Constraint Management</i> during a settlement interval, calculated as follows for each eligible operating</p>	<p>29. Please see the AESO’s response #24.</p> <p>30. It is not the AESO’s intent to amend how the payment for transmission constraint rebalancing is calculated.</p> <p>The AESO agrees that a typographical error was made during the revisions to proposed amended subsection 8 of Section 103.4 and has revised the requirement to mirror subsection 7(2) for the calculation of payment to a supplier on the margin as follows:</p> <p>The ISO must, for each eligible operating block, make a payment to a pool participant with a source asset that has delivered additional energy for transmission constraint rebalancing as per 2(2)(b)(ii) of Section 302.1 of the ISO</p>

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		<p>block:</p> <p>This amendment would mirror the proposed changes to the “Payment to a Supplier on the Margin” section and make it clear that each eligible offer block will receive a TCR payment.</p> <p>31. Further, Heartland Generation does not agree with the proposed calculation of interest without further consultation and justification from the AESO. The proposed amendments include that “the ISO may charge” interest to a pool participant if the adjustments to metering data are a result of the pool participant’s failure. It does not, however, provide the criteria that will form the basis for the AESO’s discretion of “may charge”. Additionally, the AESO has not included the cases where the adjustments to metering data are as a result of the AESO’s failure or when the party at fault is mixed or ambiguous; at the outset, it seems unfair to only address the time value of money when one party is at fault but in no other case.</p>	<p>rules, <i>Real Time Transmission Constraint Management</i> during a settlement interval, calculated as follows:</p> <p>31. Please see the AESO’s response #12.</p>
		<p><u>TransAlta</u></p> <p>32. As stated above in section 2 we do not agree with certain amendments to Section 103.4: Power Pool Financial Settlement.</p>	<p>32. The AESO acknowledges TransAlta’s comment. Please see the AESO’s responses #9 and #10.</p>
		<p><u>TCE</u></p> <p><u>ISO Rule 103.4, Power Pool Financial Settlement</u></p> <p>33. For the reasons expressed in #1 above, TCE does not support the removal of references to the preliminary power pool statements or ISO Reporting of Import and Export Transactions as this information is required by market participants and any changes to these requirements ought to require consultation and</p>	<p>33. Please see the AESO’s response #1.</p>

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		<p>Commission oversight. This includes the proposed removal of subsections 13(1) – (4) and subsection 18. However, there is an opportunity to streamline subsection 18 by removing those sections referencing dates in 2011 as they are now obsolete.</p> <p>34. It appears that the requirements in subsection 17 may be redundant with those contained within subsection 9.6.2.4.1 of Commission Rule 021. If this is the case, TCE would support the removal of this subsection. If not, TCE submits that this subsection should remain.</p> <p>35. TCE supports a streamlined dispute resolution process. However, as currently proposed, it is not clear whether the dispute process is separate and distinct from the process set out in Rule 103.2. For example, it is not clear whether a written dispute pursuant to subsection 23 of Rule 103.4 is to be submitted in accordance with subsection 3 of Rule 103.2. Further, if a financial settlement dispute is to follow the Rule 103.2 process, it is not clear how parties are to “make reasonable efforts to resolve a written dispute” as this is not contemplated within the Rule 103.2 process. TCE recommends that the AESO transfer the financial settlement dispute process from Rule 103.4 to Rule 103.2, Dispute Resolution as it may assist in removing repetitive requirements and provide clarification to the issues identified above. To the extent that there are differences between a general written dispute and a financial settlement dispute, these could be made explicit in Rule 103.2.</p> <p>36. As stated in #2 and #3 above, TCE needs further information from the AESO to better understand whether the proposed changes to the interest and</p>	<p>34. The AESO acknowledges TCE’s comment and agrees that the requirements in subsection 17 of Section 103.4 are duplicative of those contained in AUC Rule 021 and are therefore redundant.</p> <p>35. The AESO acknowledges TCE’s comment. Please see the AESO’s response #10.</p> <p>36. Please see the AESO’s response #12.</p>

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		<p>payment withholding provisions are clarifications and if not, why the change is needed. Nevertheless, with regard to the proposed subsection 18(7), TCE submits that any payments withheld should be limited to the error in the metering data.</p> <p>37. As stated above, TCE supports the AESO's proposed change to enable payments via electronic funds transfer.</p> <p><u>ISO Rule 103.6, ISO Fees and Charges</u></p> <p>38. As a market participant, having access to an up-to-date, schedule of fees and charges is necessary. As such, TCE does not support the removal of this requirement.</p> <p>However, TCE does not see a need for the requirements to specify which fees must be published provided all of the fees and charges are published. As such, TCE recommends that suggests that the AESO remove specific references to fees and simply state in subsection 2 that it must post a schedule of all current ISO fees and charges on the AESO website.</p> <p>TCE further supports the removal of subsections 4(2) and 4(4) provided they are provided in an information document.</p>	<p>37. The AESO acknowledges TCE's comment.</p> <p>38. Please see the AESO's response #24.</p>
5.	Do you have any additional comments?	<p><u>Capital Power</u></p> <p>39. Capital Power does not have any further comments at this time.</p> <p><u>Heartland Generation</u></p> <p>40. Heartland Generation does not have any additional</p>	<p>39. The AESO acknowledges Capital Power's comment.</p> <p>40. The AESO acknowledges Heartland's</p>

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		comments at this time.	comment.
		<p><u>TransAlta</u> 41. No additional comments at this time.</p>	41. The AESO acknowledges TransAlta’s comment.
		<p><u>TCE</u> 42. TCE has no additional comments at this time.</p>	42. The AESO acknowledges TCE’s comment.