

Date of Request for Comment: March 19, 2019

Period of Comment: March 19, 2019 through April 3, 2019

Please provide your comments on the following (as set out in AUC Rule 017 s. 7.2(b-j)):

Item #		Stakeholder comments	AESO Replies
1	whether you are of the view that proposed amended Section 502.4 relates to the capacity market and why or why not	<u>AltaLink Management Ltd. (“AltaLink”)</u> As the rule applies to market participants, it is AltaLink’s view that it relates to the capacity market.	The AESO acknowledges AltaLink’s comment.
2	if the answer to item #1 is yes, whether you agree that proposed amended Section 502.4 should or should not be in effect for a fixed term and why or why not	<u>AltaLink Management Ltd. (“AltaLink”)</u> As Section 502.4 is linked to 502.17, AltaLink’s view is a fixed term is inappropriate due to the nature of the infrastructure requirements and system edxpectations that Section 502.17 implies.	The AESO acknowledges AltaLink’s comment.
3	whether you understand and agree with the objective or purpose of proposed amended Section 502.4 and whether, in your view, proposed amended Section 502.4 meets the objective or purpose	<u>AltaLink Management Ltd. (“AltaLink”)</u> AltaLink understands that the objective is to clearly define the rules to ensure no overlaps or gaps, and that majority of the requirements in the current version of 502.4 have been transferred and amended to a proposed 502.17.	The AESO acknowledges AltaLink’s comment.
4	how, in your view, proposed amended Section 502.4 affects the performance of the capacity market and the electricity market	<u>AltaLink Management Ltd. (“AltaLink”)</u> It is not clear to AltaLink how this rule affects the performance of the capacity market.	The AESO acknowledges AltaLink’s comment.
5	your views on any analysis conducted or commissioned by the AESO supporting proposed amended Section 502.4	<u>AltaLink Management Ltd. (“AltaLink”)</u> AltaLink is unaware of any analysis on Section 502.4. AltaLink requests to be provided with any analysis.	The AESO does not have any data or analyses to provide in relation to this amendment.
6	whether you agree with proposed amended	<u>AltaLink Management Ltd. (“AML”)</u>	

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	Section 502.4 taken together with all ISO rules and in light of the principle of a fair, efficient and openly competitive market	AltaLink cannot agree at this time, clarification and further discussion is required. See the comment section below for more detail.	The AESO acknowledges AltaLink's comment.
7	whether you would suggest any alternatives to proposed amended Section 502.4	<p><u>AltaLink Management Ltd. (“AML”)</u></p> <p>AltaLink does not suggest any alternatives to the proposed amended Section 502.4. However, given that many of the changes are linked to the proposed 502.17, AltaLink suggests additional consultation and planning meetings with the relevant stakeholders is required for 502.17.</p>	The AESO acknowledges AltaLink's comment. See the AESO reply to <i>Stakeholder Comments and AESO Replies Matrix new 502.17 (Stage 2)</i> for the AESO's replies regarding the proposed new Section 502.17.
8	if the answer to item #1 is yes, whether you agree that proposed amended Section 502.4 supports ensuring a reliable supply of electricity at a reasonable cost to customers and why or why not	<p><u>AltaLink Management Ltd. (“AltaLink”)</u></p> <p>AltaLink is not clear on the expectations and whether a cost benefit analysis was completed on the proposed approach in 502.17. Therefore it cannot determine if 502.4 is aligned with ensuring a reliable supply of electricity at a reasonable cost to customers.</p>	The AESO acknowledges AltaLink's comment. See the AESO reply to <i>Stakeholder Comments and AESO Replies Matrix new 502.17 (Stage 2)</i> for the AESO's replies to AltaLink's comments regarding the proposed new Section 502.17.
9	whether you agree that proposed amended Section 502.4 supports the public interest and why or why not	<p><u>AltaLink Management Ltd. (“AltaLink”)</u></p> <p>AltaLink can agree that the changes to 502.4 supports public interest in the attempt to clarify requirements. However, the proposed 502.17 rule requires further clarification and discussion.</p>	The AESO acknowledges AltaLink's comment. See the AESO replies to <i>Stakeholder Comments and AESO Replies Matrix new 502.17 (Stage 2)</i> for the AESO's replies to AltaLink's comments regarding the proposed new Section 502.17.
10	whether you have any additional comments	<p><u>AltaLink Management Ltd. (“AltaLink”)</u></p> <ol style="list-style-type: none"> 1. No additional comments on proposed Section 502.4 . 2. However, given the link between 502.4 and proposed 502.17, AltaLink considers the new proposed section 502.17 to be considerably more specific, prescriptive, operationally onerous, and financially impactful than the existing COM-001 and COM-002. More discussion and 	<ol style="list-style-type: none"> 1. The AESO acknowledges AltaLink's comment. 2. The AESO acknowledges AltaLink's comment. See the AESO replies to <i>Stakeholder Comments and AESO Replies Matrix new 502.17 (Stage 2)</i> for the AESO's replies to AltaLink's comments regarding the proposed new Section 502.17.

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		clarification is required on this proposed rule as there are major concerns on cost and timing.	