

Proposed Amended Section 205.6, Supplemental Reserve Technical Requirements and Performance Standards ("amended Section 205.6")

Date of Request for Comment: September 28, 2017

Period of Comment: September 28, 2017 through October 13, 2017

Comments From: TransCanada Energy Ltd. (TCE)

Date [yyyy/mm/dd]: 2017/10/13

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Listed below is the summary description of changes for the proposed amended Section 205.6. Please refer back to the Letter of Notice under the "Attachments to Letter of Notice" section to view the actual proposed content changes to the ISO rules. Please place your comments/reasons for position underneath (if any).

## ISO Rules

## Amended

The AESO is seeking comments from market participants with regard to the following matters:

- 1. Do you agree or disagree with the proposed amended Section 205.6? If you disagree, please provide comments.
- 2. Are there any subsections where the language does not clearly articulate the requirement for either the AESO or a market participant? If yes, please indicate the subsections and suggest language that would improve the clarity.

## Market Participant Comments and/or Alternate Proposal

## Comment # 1:

In its September 28, 2017 Letter of Notice, the AESO stated that "[e]xisting providers of operating reserve will not be impacted by the amendments described above as their pool assets continue to meet the eligibility and performance requirements, and remain qualified to provide operating reserve."

After reviewing the proposed changes TCE is not aware of any provisions that grandfather existing providers of operating reserves. Has the AESO reviewed the capabilities of the existing providers to confirm that each facility will not be impacted? If not, please provide the necessary assurances within the proposed rule that is consistent with the AESO's statement that these facilities will remain qualified.