

Market Participant Comment Matrix – March 8, 2018

Amended Section 103.6 of the ISO Rules, *ISO Fees and Charges* (“Section 103.6”)



Date of Request for Comment: March 8, 2018
Period of Comment: March 8, 2018 through March 23, 2018
Comments From: TransCanada Energy Ltd. (TCE)
Date [yyyy/mm/dd]: March 23, 2018

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Listed below is the summary description of changes for the proposed Section 103.6. 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	Market Participant Comments and/or Alternate Proposal
<p>Amended</p> <p>The AESO is seeking comments from market participants with regard to the following matters:</p> <ol style="list-style-type: none"> 1. Do you agree or disagree with the proposed Section 103.6? 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. 	<p>Comment # 1:</p> <p><i>TCE appreciates the opportunity to provide comments with respect to the proposed rule change. While TCE does not necessarily object to the proposed rule change, we do have some concerns, which are expressed below.</i></p> <p><i>The energy market trading charge has been calculated on an annual basis for a number of years and is relied upon by Market Participants for budgeting and analytical purposes. As such, it would be helpful for Market Participant to understand how often, and under what circumstances, the AESO intends to amend the charge mid-year. Is the AESO intending to make mid-year amendments on a routine basis or only in certain circumstances? If the former, TCE recommends that the schedule align with the quarterly Rider E amendments. If the latter, the circumstances or thresholds by which the AESO determines a mid-year amendment are required should be transparent. Either way, TCE strongly recommends the AESO include such information in Section 6 of the Rule.</i></p> <p><i>TCE recommends that additional language be added to Section 6(1) of the Rule to specify how an amended mid-year energy market trading charge would be calculated.</i></p> <p><i>Under the current Rule, variances between the budgeted and actual amounts from the prior year are amortized over a full calendar year. TCE is concerned that a late-year amendment could result in a material change to the energy market trading charge. For example, if the AESO were to discover in late October that the agencies were significantly over budget, they could inform Market Participants of an amendment on November 1 and effect the change for December 1. If the calculation amortizes that change over the expected MWhs for that December, the amendment could be material and significantly affect Market Participants. TCE notes that Rider E amendments are done on a quarterly basis and, as a result, are amortized over a period no less than a full calendar quarter. TCE recommends that mid-year amendments to the energy market be treated similarly such that no amendments may be implemented after October 1. Any variances after this date would be accounted for in the following calendar year. On this basis, TCE recommends that section 6(1) of the Rule be amended to reflect this.</i></p> <p><i>TCE requests the AESO provide the rationale for why the proposed changes are necessary as this will better allow Market Participants to recommend language changes to the Rule that meet both their needs and the AESO's.</i></p>