

Proposed Amended ISO rule – Section 201.13, *Capacity Market Clearing*

<b>Period of Comment:</b>	September 7, 2018	through	September 28, 2018	<b>Contact:</b>	Mark Thompson
<b>Comments From:</b>	TransCanada Energy Ltd. (TCE)			<b>Phone:</b>	403-920-5005
<b>Date [yyyy/mm/dd]:</b>	2018-09-28			<b>Email:</b>	markj_thompson@transcanada.com

***Please provide comments relating to the subsection of the proposed amendments to the rule in the corresponding box. Please include any views on whether the language clearly articulates the requirement for either the AESO or a market participant, and provide any proposed alternative wording by blacklining the proposed language below.***

Section	Subsection	Proposed language	Stakeholder comments
		<b>Auction Clearing</b>	
2	(1)	<p>The ISO must use a clearing process that clears <b>offers</b> and <b>bids</b>, as applicable, in a manner that maximizes social surplus with consideration of the following:</p> <ul style="list-style-type: none"> <li>(a) a lower priced <b>capacity block</b> in an <b>offer</b> will be cleared before a higher priced <b>capacity block</b> in an <b>offer</b>;</li> <li>(b) a higher priced <b>capacity block</b> in a <b>bid</b> will be cleared before a lower priced <b>capacity block</b> in a <b>bid</b>;</li> <li>(c) when multiple equivalent <b>flexible blocks</b> are submitted at the clearing price and result in the same social surplus, clear such equivalent <b>flexible blocks</b> as follows:                             <ul style="list-style-type: none"> <li>(i) on a pro-rata basis, if all pro-rated quantities in MW remain whole numbers; or</li> <li>(ii) on a random basis, in all other cases;</li> </ul> </li> <li>(d) when multiple equivalent <b>inflexible blocks</b> are submitted at the clearing price and result in the same social surplus, clear such equivalent <b>inflexible blocks</b> as follows:                             <ul style="list-style-type: none"> <li>(i) clear a combination of the smallest volume <b>inflexible blocks</b>, if possible;</li> </ul> </li> </ul>	<p>TCE submits that flexible blocks, as referenced in subsection (e), should take precedence over inflexible blocks. This rewards and incents flexibility, which is desirable because it allows social surplus to be maximized more efficiently. Since parts (c) and (d) are special cases of subsection (e) (that deals with multiple flexible and inflexible blocks), each of these subsections should be removed and be replaced by a new part (c) as drafted below:</p> <ul style="list-style-type: none"> <li>(c) when multiple <b>capacity blocks</b> are submitted at the clearing price, clear based on the following rules in order of priority:                             <ul style="list-style-type: none"> <li>(i) clear in a manner that maximizes social surplus;</li> <li>(ii) prioritize volume from <b>flexible blocks</b> over volume from <b>inflexible blocks</b>;</li> <li>(iii) reduce the cleared volume for all <b>flexible blocks</b> on a pro-rata basis where necessary;</li> <li>(iv) prioritize smaller <b>inflexible blocks</b> over larger <b>inflexible blocks</b>; and</li> <li>(v) randomly choose among equivalent <b>inflexible blocks</b>.</li> </ul> </li> </ul> <p>TCE suggests that the AESO develop a separate rule section that outlines the process and the proper oversight for item (v).</p>

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		<p>or</p> <p>(ii) on a random basis, in all other cases; and</p> <p>(e) when multiple equivalent <b>flexible blocks</b> and <b>inflexible blocks</b> are submitted at the clearing price and result in the same social surplus, clear such equivalent <b>flexible blocks</b> and <b>inflexible blocks</b> on a random basis.</p>	
		<p><b>Consideration of Transmission Market Constraint and Transfer Path Limits in Clearing Process</b></p>	
4	(1)	<p>The <b>ISO</b> may, in the event that the <b>ISO</b> determines that the energy associated with an <b>offer</b> may be unable to be delivered to the <b>interconnected electric system</b> during the <b>obligation period</b> due to either a <b>transmission market constraint</b> or a limit on an Alberta <b>intertie</b> determined in accordance with subsection 3:</p> <p>(a) not clear the <b>offer</b>;</p> <p>(b) clear a portion of the <b>offer</b>; or</p> <p>(c) if there are multiple <b>flexible blocks</b> impacted by the same <b>transmission market constraint</b> or limit on an Alberta <b>intertie</b> either:</p> <p>(i) not clear the <b>flexible blocks</b>; or</p> <p>(ii) when multiple equivalent <b>flexible blocks</b> are submitted at the same price and result in the same social surplus, clear such equivalent <b>flexible blocks</b> on a pro-rata basis.</p> <p>(d) if there are multiple <b>inflexible blocks</b> impacted by the same <b>transmission market constraint</b> or limit on an Alberta <b>intertie</b> either:</p> <p>(i) not clear the <b>inflexible blocks</b>; or</p> <p>(ii) when multiple equivalent <b>inflexible blocks</b> are submitted at the same price and result in the same social surplus, clear such equivalent <b>inflexible blocks</b> on a random basis.</p>	<p>The current congestion management approach for the real-time energy market should not be used in the capacity market. Instead, the AESO should clear the offer and plan to address the congestion. In the event congestion persists, the offer should be paid and the market cleared at the uncongested price. Only in the event that a potential constraint causes an adequacy concern (i.e. failure to meet the minimum) should the AESO take an action to clear incremental volume.</p>
		<p><b>Setting Auction Clearing Price</b></p>	

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5	(1)	<p>The <b>ISO</b> must establish the clearing price of a <b>base auction</b> or <b>rebalancing auction</b>, without consideration of <b>transmission market constraints</b> in subsection 4, at the point on the demand curve that:</p> <ul style="list-style-type: none"> <li>(a) intersects with the supply curve; or</li> <li>(b) corresponds to the volume of the cleared offers where the entire cleared offers are below the demand curve.</li> </ul>	<p>TCE agrees with this section subject to all capacity being cleared and paid. Congestion should not preclude participation in the market.</p>

**Please provide your comments on the following (as set out in AUC Rule 017 s. 13(b-j)):**

Item #		Stakeholder comments
1	whether you agree that amended ISO rule – <i>Section 201.13, Capacity Market Clearing</i> relates to the capacity market and why or why not	
2	whether you agree that amended ISO rule – <i>Section 201.13, Capacity Market Clearing</i> should [or should not] be in effect for a fixed term and why or why not	
3	whether you understand and agree with the objective or purpose of amended ISO rule – <i>Section 201.13, Capacity Market Clearing</i> and whether, in your view, <i>Section 201.13, Capacity Market Clearing</i> meets the objective or purpose	
4	how, in your view, amended ISO rule – <i>Section 201.13, Capacity Market Clearing</i> affects the performance of the capacity market and the electricity market	
5	your views on any analysis conducted or commissioned by the AESO supporting amended ISO rule – <i>Section 201.13, Capacity Market Clearing</i>	
6	whether you agree with amended ISO rule – <i>Section 201.13, Capacity Market Clearing</i> taken together with all ISO rules and in light of the principle of a fair, efficient and openly competitive market	
7	whether you would suggest any alternatives to amended ISO rule – <i>Section 201.13, Capacity Market Clearing</i>	

Item #		Stakeholder comments
8	whether you agree that the proposed provisional rule supports ensuring a reliable supply of electricity at a reasonable cost to customers and why or why not	
9	whether you agree that the proposed provisional rule supports the public interest and why or why not	

***Please provide your views on the type of content that should be included in an information document associated with amended ISO rule – Section 201.13, Capacity Market Clearing.***

# Stakeholder Comment Matrix – September 7, 2018



## Proposed New ISO rule – Section 201.15, *Delisting*

**Period of Comment:** September 7, 2018 through September 28, 2018      **Contact:** Mark Thompson  
**Comments From:** TransCanada Energy Ltd. (TCE)      **Phone:** 403-920-5005  
**Date [yyyy/mm/dd]:** 2018-09-28      **Email:** markj\_thompson@transcanada.com

**Please provide comments relating to the subsection of the proposed rule in the corresponding box. Please include any views on whether the language clearly articulates the requirement for either the AESO or a market participant, and provide any proposed alternative wording by blacklining the proposed language below.**

Section	Subsection	Proposed language	Stakeholder comments
		<b>Applicability</b>	
1		Section 201.15 applies to: <ul style="list-style-type: none"> <li>(a) a <b>capacity market participant</b>;</li> <li>(b) a <b>pool participant</b>;</li> <li>(c) the <b>legal owner</b> of a <b>generating unit</b> or <b>aggregated generating facility</b> where such <b>generating unit</b> or <b>aggregated generating facility</b> is the subject of a permanent delist notification; and</li> <li>(d) the <b>ISO</b>.</li> </ul>	
		<b>Requirements</b>	
		<b>Request to Temporarily Delist for Economic Reasons</b>	
2	(1)	A <b>capacity market participant</b> may, within the timelines specified in the <i>Capacity Market Auction Guidelines</i> for the last <b>rebalancing auction</b> and in the manner the <b>ISO</b> specifies, submit to the <b>ISO</b> a request to temporarily delist an asset for the <b>obligation period</b> for economic reasons.	
2	(2)	A <b>capacity market participant</b> must, in the request referred to in subsection 2(1), submit:	In general, TCE is concerned that the AESO is overly prescriptive in these rules. There is a real economic cost in reducing participant flexibility and there is no obvious benefit in

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		<p>(a) an attestation from a corporate officer of the <b>pool participant</b>:</p> <p>(i) that the <b>pool participant</b> confirms that if the request is approved by the <b>ISO</b>, the <b>delist outage</b> in the energy market in the <b>obligation period</b> will total greater than 210 <b>days</b> such that participation in the energy market is for a continuous period of 155 days or less;</p> <p>(ii) the MW volume of the asset that will be subject to a <b>delist outage</b> in the energy market;</p> <p>(iii) the start date and the end date of the <b>delist outage</b> referred to in 2(2)(b)(i);</p> <p>(b) the avoidable costs associated with the <b>delist outage</b> referred to in subsection 2(2)(a);</p> <p>(c) any information necessary for the ISO to calculate the energy and ancillary services offset in accordance with subsection 3(2).</p> <p>(d) an attestation from a corporate officer of the <b>legal owner</b> of the asset that the avoidable costs and information referred to in subsections 2(2)(b) and 2(2)(c), respectively, are accurate; and</p> <p>(e) any other information the <b>ISO</b> specifies as it relates to the request to temporarily delist an asset for economic reasons.</p>	<p>this case. Participants must submit cost data and illustrate that an asset is not economic to operate in order to de-list. It is unclear why the AESO effectively mandates retirement or operating at a loss after 2 years.</p>
		<p><b>ISO Review and Approval of Request to Temporarily Delist for Economic Reasons</b></p>	
3	(1)	<p>The <b>ISO</b> may exclude all or a portion of the avoidable costs submitted pursuant to subsection 2(2)(b) where such costs, in the <b>ISO</b>'s determination, are unreasonable.</p>	
3	(2)	<p>The <b>ISO</b> must calculate the energy and ancillary services offset, as applicable, for the asset during the <b>obligation period</b> using the methodology set out in Section 206.11 of <b>ISO rules, Energy and Ancillary Services Offset for Assets</b>.</p>	
3	(3)	<p>The <b>ISO</b> may, where the <b>ISO</b> determines that the energy associated with the outage referred to in subsection 2(2)(a) is not necessary to maintain <b>reliability</b> during the <b>obligation period</b>, approve a request to temporarily delist for economic reasons.</p>	<p>The reliability requirement in this subsection is unnecessary and should be removed as the market will take care of this automatically. If an asset that has applied to temporarily economic delist is needed for reliability, it will clear the capacity market and will be prevented from delisting. In this case the asset is kept whole, at least on a forecast basis.</p>



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			<p>If it does not clear, then it was not needed for reliability and the asset may delist to mitigate its losses.</p> <p>As currently drafted, there is a gap whereby the AESO may reject a delist request and the asset fails to clear the market. In this case, it turns out that the asset is not required for reliability and yet is prevented from delisting. If the AESO decides to keep the reliability requirement in this subsection, it must provide adequate compensation to keep the asset whole.</p>
3	(4)	<p>The <b>ISO</b> must, if it approves a request pursuant to subsection 3(3), provide the <b>capacity market participant</b>, within the timelines specified in the <i>Capacity Market Auction Guidelines</i> for the last <b>rebalancing auction</b>, with a price based on the remaining avoidable costs submitted in accordance with subsection 2(2)(b) that have not been excluded in accordance with subsection 3(3), net of the energy and ancillary services offset.</p>	
		<p><b>Submission of Offer Price for Temporary Economic Delist</b></p>	
4		<p>Notwithstanding Section 206.4 of the <b>ISO rules</b>, <i>Offers and Bids for the Capacity Market</i>, a <b>capacity market participant</b> that has been provided a price in accordance with subsection 3(4) must submit an <b>offer</b> comprised of one <b>capacity block</b> at the price specified in subsection 3(4) in the last <b>rebalancing auction</b> for the MW volume set out in subsection 2(2)(a)(ii).</p>	
		<p><b>Request to Temporarily Delist due to Physical or Operational Limitations</b></p>	
5	(1)	<p>A <b>capacity market participant</b> must, within the timelines specified in the <i>Capacity Market Auction Guidelines</i> and in the manner the <b>ISO</b> specifies, submit to the <b>ISO</b> a request to temporarily delist an asset from the capacity market for the <b>obligation period</b> if the asset will be subject to a derate or an outage for a period greater than or equal to 150 continuous <b>days</b> in the <b>obligation period</b> due to a physical operational limitation of the asset of the <b>capacity market participant</b>.</p>	<p>TCE submits that the timelines should not be noted in guidelines, but rather should be included directly in this rule. This provides investor certainty as the timelines cannot then be easily changed by the AESO.</p> <p>Further, TCE submits that in the case where an asset substitutes out of its obligation within the delivery year, it should be able to de-list to avoid the uniform capacity value reduction, <i>i.e.</i> where a unit experiences a large force majeure and substitutes out of its capacity obligation while it is being repaired.</p>

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5	(2)	<p>A <b>capacity market participant</b> must, subject to subsection 5(3), submit the following information to the <b>ISO</b> in the request referred to in subsection 5(1):</p> <ul style="list-style-type: none"> <li>(a) a description of the physical or operational limitation;</li> <li>(b) a description of any major repairs required to rectify the physical or operational limitation; and</li> <li>(c) if applicable, an order, decision, final rule, opinion or final directive from a regulatory authority specifically mandating the derating of the asset.</li> </ul>	
5	(3)	<p>A <b>capacity market participant</b> must, in the case of an asset with <b>new capacity</b>, refurbished capacity or incremental capacity, submit to the <b>ISO</b> in the request referred to in subsection 5(1) an attestation from a corporate officer of the <b>capacity market participant</b> certifying that the <b>new capacity</b>, refurbished capacity or incremental capacity will not be in full commercial operation prior to the <b>obligation period</b>.</p>	<p>This rule appears to impose a requirement to delist if new, refurbished, or incremental capacity is not energized prior to the obligation period. This is inconsistent with other rules that allow for assets to energize during the obligation period and still receive capacity payments for that delivery year. This discrepancy requires clarification.</p>
5	(4)	<p>A <b>capacity market participant</b> must, in the request referred to in subsection 5(1), submit:</p> <ul style="list-style-type: none"> <li>(a) an attestation from a corporate officer of the <b>pool participant</b>: <ul style="list-style-type: none"> <li>(i) that the <b>pool participant</b> confirms that if the request is approved by the <b>ISO</b>, the <b>delist outage</b> in the energy market will be for a continuous period in the <b>obligation period</b> which must be greater than 150 days;</li> <li>(ii) the MW volume of the asset that will be subject to a <b>delist outage</b> in the energy market;</li> <li>(iii) a description of the physical or operational limitation of the asset; and</li> </ul> </li> <li>(iv) the start date and the end date of the <b>delist outage</b> referred to in 5(2)(c)(i); and</li> <li>(b) any other information the <b>ISO</b> specifies as it relates to the request to temporarily delist the asset.</li> </ul>	
		<p><b>ISO Approval of Request to Temporarily Delist due to a Physical or Operational Limitation</b></p>	

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6	(1)	<p>The <b>ISO</b> must approve a request to temporarily delist an asset due to a physical or operational limitation if:</p> <ul style="list-style-type: none"> <li>(a) the <b>ISO</b> is satisfied that the request referred to in subsection 5(1) is complete; and</li> <li>(b) the <b>delist outage</b> referred in subsection 5(2)(a) is greater than 150 continuous days in the <b>obligation period</b>.</li> </ul>	
6	(2)	<p>Notwithstanding subsection 6(1), the <b>ISO</b> may not approve a request to temporarily delist an asset if, in the <b>ISO</b>'s determination, the volume of <b>capacity</b> is necessary to maintain <b>reliability</b>.</p>	
		<p><b>Delist Outage</b></p>	
7	(1)	<p>A <b>pool participant</b> must, if the <b>offer</b> referred to in subsection 4(1) does not clear in the last <b>rebalancing auction</b>, submit a <b>delist outage</b> that corresponds to the outage declared in accordance with subsection 2(2)(a).</p>	
7	(2)	<p>A <b>pool participant</b> must, if the <b>ISO</b> approves a request pursuant to subsection 6, submit a <b>delist outage</b> that corresponds to the outage declared in accordance with subsection 5(2)(a).</p>	
		<p><b>Request to Change Delist Outage</b></p>	
8	(1)	<p>A <b>pool participant</b> must submit a request to the <b>ISO</b> to change the <b>delist outage</b> submitted in accordance with subsection 7(2) in the manner the <b>ISO</b> specifies.</p>	
8	(2)	<p>The <b>ISO</b> may approve a request submitted under subsection 8(1) if the <b>ISO</b> determines that the change to the <b>delist outage</b> has no material impact to <b>reliability</b>, unless such request reduces the <b>delist outage</b> to less 150 <b>days</b>.</p>	<p>TCE recommends the following change in the section wording: "...if the <b>ISO</b> determines that the change to the delist outage has no material impact to reliability <u>or would result in improved reliability...</u>"</p> <p>The current language in the rules appears to only consider increases to the length of a de-list outage, and not consider market participants who may apply to return from a delist early.</p>

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			This restriction appears to indicate that, for example, after 70 days of an expected 160-day outage, a plant could not reduce its delist outage to 130 days. Would the plant need to stay offline for 150 days to satisfy this rule and avoid reductions to its uniform capacity value? What is the intent of this approach?
		<b>Restriction on Ability to Temporarily Delist</b>	
9		A <b>capacity market participant</b> must not temporarily delist an asset for more than two consecutive <b>obligation periods</b> .	It is unclear what recourse is available to market participants who require more than two obligations periods to complete repairs to an asset in the event of a physical delist? These market participants should not be required to take performance risks when they fully expect to continue their outage. The 2-year restriction is inefficient and serves no useful purpose.
		<b>Permanent Delist Notification</b>	
11	(1)	A <b>capacity market participant</b> may, in accordance with the timelines established in the <i>Capacity Market Auction Guidelines</i> for the <b>base auction</b> or the first <b>rebalancing auction</b> for an <b>obligation period</b> , and in the manner the <b>ISO</b> specifies, submit to the <b>ISO</b> a notification to permanently delist an asset.	
11	(2)	<p>A <b>capacity market participant</b> must, in the notification referred to in subsection 11(1), submit:</p> <p>(a) the MW volume from the asset that the <b>capacity market participant</b> is permanently delisting; and</p> <p>(b) in the case of a <b>generating unit, aggregated generating facility or energy storage facility</b>:</p> <p>(i) an attestation from a corporate officer of the <b>pool participant</b>:</p> <p>(A) that the <b>pool participant</b> confirms that the MW volume referred to in subsection 11(2)(a) will be removed from the energy market on or before the first <b>day</b> of June in the <b>obligation period</b>; and</p> <p>(B) the date that the MW volume from the asset will be removed from the energy market.</p>	

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		(ii) an attestation from a corporate officer of the <b>legal owner</b> : (A) that the <b>legal owner</b> confirms that the MW volume referred to in subsection 11(2)(a) will be removed from the energy market on or before the first <b>day</b> of June in the <b>obligation period</b> ; and (B) the date that the MW volume from the asset will be removed from the energy market.	
11	(3)	A <b>capacity market participant</b> may not revoke a notification to permanently delist after it has been submitted to the <b>ISO</b> in accordance with subsections 11(1) and 11(2).	
11	(4)	The <b>ISO</b> must implement the removal of the MW volume from an asset referred to in subsection 11(2) from the energy market.	

**Please provide your comments on the following (as set out in AUC Rule 017 s. 13(b-j)):**

Item #		Stakeholder comments
1	whether you agree that the proposed new ISO Rule – Section 201.15, <i>Delisting</i> relates to the capacity market and why or why not	
2	whether you agree that the proposed new ISO Rule – Section 201.15, <i>Delisting</i> should [or should not] be in effect for a fixed term and why or why not	
3	whether you understand and agree with the objective or purpose of the proposed new ISO Rule – Section 201.15, <i>Delisting</i> and whether, in your view, the proposed new ISO Rule – Section 201.15, <i>Delisting</i> meets the objective or purpose	
4	how, in your view, the proposed new ISO Rule – Section 201.15, <i>Delisting</i> affects the performance of the capacity market and the electricity market	
5	your views on any analysis conducted or commissioned by the AESO supporting the proposed new ISO Rule – Section 201.15, <i>Delisting</i>	
6	whether you agree with the proposed new ISO Rule – Section 201.15, <i>Delisting</i> taken together with all ISO rules and in light of the principle of a fair, efficient and openly competitive market	
7	whether you would suggest any alternatives to the proposed new ISO Rule – Section 201.15, <i>Delisting</i>	

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8	whether you agree that the proposed provisional rule supports ensuring a reliable supply of electricity at a reasonable cost to customers and why or why not	
9	whether you agree that the proposed provisional rule supports the public interest and why or why not	

***Please provide your views on the type of content that should be included in an information document associated with the proposed new ISO Rule – Section 201.15, Delisting.***



Proposed Amended ISO rule – Section 202.3, *Issuing Dispatches for Equal Prices*

<b>Period of Comment:</b>	September 7, 2018	through	September 28, 2018	<b>Contact:</b>	Mark Thompson
<b>Comments From:</b>	TransCanada Energy Ltd. (TCE)			<b>Phone:</b>	403-920-5005
<b>Date [yyyy/mm/dd]:</b>	2018-09-28			<b>Email:</b>	markj_thompson@transcanada.com

***Please provide comments relating to the subsection of the proposed amendments to the rule in the corresponding box. Please include any views on whether the language clearly articulates the requirement for either the AESO or a market participant, and provide any proposed alternative wording by blacklining the proposed language below.***

Section	Subsection	Proposed language	Stakeholder comments
		<p><b>Requirements</b></p> <p><b>Equally-Priced Operating Blocks</b></p>	
2	(3)	Notwithstanding subsection 2(1) and 2(2), the <b>ISO</b> must, when issuing <b>dispatches</b> in the energy market <b>merit order</b> where there are 1 or more equally-priced <b>operating blocks</b> in an <b>offer</b> or <b>bid</b> consisting of both <b>source assets</b> and load <b>sink assets</b> , attempt to accommodate the <b>source assets</b> before issuing <b>dispatches</b> for the load <b>sink assets</b> .	<p>TCE agrees that source assets should be dispatched prior to load sink assets.</p> <p>The AESO should clarify in the rule language: (1) how the AESO would attempt to "accommodate the source assets before issuing dispatches for the load sink assets"; and (2) under what circumstances the AESO may be unable to "accommodate the source assets before issuing dispatches for the load sink assets". These circumstances must be specified in the Rule so that market participants understand when and why assets are dispatched.</p>
2	(4)	<p>Notwithstanding subsection 2(1), the <b>ISO</b> must:</p> <ul style="list-style-type: none"> <li>(a) determine <b>dispatch</b> volumes for a <b>pool asset</b> that is an import asset or an export asset in accordance with the procedures set out in Section 303.3 of the <b>ISO rules</b>, <i>Intertie Path Operations</i>; and</li> <li>(b) issue <b>dispatches</b> for equally priced \$0.00 <b>offers</b> in accordance with Section 202.5 of the <b>ISO rules</b>, <i>Supply Surplus</i>.</li> </ul>	

**Please provide your comments on the following (as set out in AUC Rule 017 s. 13(b-j)):**

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1	whether you agree that amended ISO rule – Section 202.3, <i>Issuing Dispatches for Equal Prices</i> relates to the capacity market and why or why not	
2	whether you agree that amended ISO rule – Section 202.3, <i>Issuing Dispatches for Equal Prices</i> should [or should not] be in effect for a fixed term and why or why not	
3	whether you understand and agree with the objective or purpose of amended ISO rule – Section 202.3, <i>Issuing Dispatches for Equal Prices</i> and whether, in your view, Section 202.3, <i>Issuing Dispatches for Equal Prices</i> meets the objective or purpose	
4	how, in your view, amended ISO rule – Section 202.3, <i>Issuing Dispatches for Equal Prices</i> affects the performance of the capacity market and the electricity market	
5	your views on any analysis conducted or commissioned by the AESO supporting amended ISO rule – Section 202.3, <i>Issuing Dispatches for Equal Prices</i>	
6	whether you agree with amended ISO rule – Section 202.3, <i>Issuing Dispatches for Equal Prices</i> taken together with all ISO rules and in light of the principle of a fair, efficient and openly competitive market	
7	whether you would suggest any alternatives to amended ISO rule – Section 202.3, <i>Issuing Dispatches for Equal Prices</i>	

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8	whether you agree that the proposed provisional rule supports ensuring a reliable supply of electricity at a reasonable cost to customers and why or why not	
9	whether you agree that the proposed provisional rule supports the public interest and why or why not	

***Please provide your views on the type of content that should be included in an information document associated with amended ISO rule – Section 202.3, Issuing Dispatches for Equal Prices.***

Proposed Amended ISO rule – Section 203.1, *Offers and Bids for Energy*

<b>Period of Comment:</b>	September 7, 2018 through September 28, 2018	<b>Contact:</b>	Mark Thompson
<b>Comments From:</b>	TransCanada Energy Ltd. (TCE)	<b>Phone:</b>	403-920-5005
<b>Date [yyyy/mm/dd]:</b>	2018-09-28	<b>Email:</b>	markj_thompson@transcanada.com

***Please provide comments relating to the subsection of the proposed amendments to the rule in the corresponding box. Please include any views on whether the language clearly articulates the requirement for either the AESO or a market participant, and provide any proposed alternative wording by blacklining the proposed language below.***

Section	Subsection	Proposed language	Stakeholder comments
		<b>Applicability</b>	
1		Section 203.1 applies to: (a) a <b>pool participant</b> when participating in the energy market; and (b) the <b>ISO</b> .	
		<b>Requirements</b> <b>Submission Method and Timing</b>	
2	(2)	A <b>pool participant</b> submitting an <b>offer</b> or <b>bid</b> for a generating <b>source asset</b> or load <b>sink asset</b> , respectively, must submit such <b>offer</b> or <b>bid</b> : (a) before 12:00 hours on the <b>day</b> before the <b>day</b> that the <b>offer</b> or <b>bid</b> is effective, subject to any extension of time granted pursuant to subsection 3 of section 201.4 of the <b>ISO rules</b> , <i>Submission Methods and Coordination of Submissions</i> ; and (b) no earlier than 00:00 hours, 7 <b>days</b> prior to the <b>day</b> that the <b>offer</b> or <b>bid</b> is effective.	

Section	Subsection	Proposed language	Stakeholder comments
2	(3)	<p>A <b>pool participant</b> submitting an <b>offer</b> or <b>bid</b> for an import asset or export asset, respectively, must submit such <b>offer</b> or <b>bid</b>:</p> <ul style="list-style-type: none"> <li>(a) no later than 2 hours prior to the start of the <b>settlement interval</b>; and</li> <li>(b) no earlier than 00:00 hours, 7 <b>days</b> prior to the <b>day</b> that the <b>offer</b> or <b>bid</b> is effective.</li> </ul>	
		<b>Must-Offer and May-Offer</b>	
3	(1)	<p>A <b>pool participant</b> must submit <b>offers</b> in the energy market for each <b>settlement interval</b>, for each of its <b>pool assets</b>, that are:</p> <ul style="list-style-type: none"> <li>(a) generating <b>source assets</b> with a <b>maximum capability</b> of 5 MW or greater;</li> <li>(b) load <b>sink assets</b> subject to a <b>capacity commitment</b> with a <b>maximum capability</b> of 5 MW or greater; or</li> <li>(c) import assets subject to a <b>capacity commitment</b>;</li> </ul>	
3	(2)	<p>A <b>pool participant</b> may submit <b>offers</b> in the energy market for each <b>settlement interval</b>, for any of its <b>pool assets</b> that are import assets.</p>	
3	(3)	<p>A <b>pool participant</b> may submit <b>offers</b> in the energy market, for any of its <b>pool assets</b> that are:</p> <ul style="list-style-type: none"> <li>(a) generating <b>source assets</b> subject to a <b>capacity commitment</b> with a <b>maximum capability</b> greater than or equal to 1 MW and less than 5 MW; or</li> <li>(b) load <b>sink assets</b> subject to a <b>capacity commitment</b> with a <b>maximum capability</b> greater than or equal to 1 MW and less than 5 MW.</li> </ul>	
3	(4)	<p>A <b>pool participant</b> that chooses to submit <b>offers</b> in accordance with subsection 3(3) must notify the <b>ISO</b>, in the manner the <b>ISO</b> specifies.</p>	
3	(5)	<p>The <b>ISO</b> must, upon receiving a notification in accordance with subsection 3(4), provide the <b>pool participant</b> with the ability to submit <b>offers</b>.</p>	

Section	Subsection	Proposed language	Stakeholder comments
3	(6)	A <b>pool participant</b> with a <b>pool asset</b> that is provided the ability to submit <b>offers</b> in accordance with subsection 3(5) must submit <b>offers</b> in the energy market for each <b>settlement interval</b> .	
3	(7)	Notwithstanding subsections 3(1), 3(2), and 3(6), a <b>pool participant</b> must not submit <b>offers</b> for energy that is committed under a contract for <b>resource adequacy standard</b> threshold actions referred to in section 202.6 of the <b>ISO rules</b> , <i>Adequacy of Supply</i> .	
		<b>Offer Content</b>	
4	(1)	<p>A <b>pool participant</b> must include in each <b>operating block</b> in an <b>offer</b>;</p> <ul style="list-style-type: none"> <li>(a) a price in \$/MWh to the nearest cent per MWh which: <ul style="list-style-type: none"> <li>(i) in the case of a generating <b>source asset</b> or a load <b>sink asset</b>, is greater than or equal to zero dollars (\$0) per MWh and less than one thousand dollars (\$1000) per MWh;</li> <li>(ii) in the case of an import asset that has been only allocated 1 <b>operating block</b> in accordance with section 201.5 of the <b>ISO rules</b>, <i>Energy Market Block Allocation</i>, \$0.00 per MWh; or</li> <li>(iii) in the case of an import asset that has been allocated 7 <b>operating blocks</b> in accordance with section 201.5 of the <b>ISO rules</b>, <i>Energy Market Block Allocation</i> is greater than or equal to \$0.01 per MWh and less than or equal to \$999.99 per MWh;</li> </ul> </li> <li>(b) a quantity in MW; and</li> <li>(c) an indication of whether the <b>operating block</b> is a <b>flexible block</b> or an <b>inflexible block</b>.</li> </ul>	
4	(2)	A <b>pool participant</b> that submits an <b>offer</b> must also submit the <b>minimum stable generation</b> for a generating <b>source asset</b> .	
4	(3)	<p>A <b>pool participant</b> that submits an <b>offer</b> must ensure that:</p> <ul style="list-style-type: none"> <li>(a) the cumulative total MW, as entered for the highest priced <b>operating block</b> in</li> </ul>	

Section	Subsection	Proposed language	Stakeholder comments
		<p>the <b>offer</b> for the <b>settlement interval</b>, equals the <b>maximum capability</b> of the <b>pool asset</b>; and</p> <p>(b) the <b>minimum stable generation</b> submitted for the generating <b>source asset</b> does not exceed the MW of the <b>operating block</b> with the lowest <b>offer</b> price for the <b>source asset</b> and a quantity greater than 0 MW, including when submitted as part of a restatement under section 203.3 of the <b>ISO rules</b>, <i>Energy Restatements</i>.</p>	
		<b>Available Capability</b>	
6		A <b>pool participant</b> that submits an <b>offer</b> must also submit the <b>available capability</b> , in MW, for each <b>source asset</b> or load <b>sink asset</b> , which such <b>available capability</b> must equal the <b>maximum capability</b> of the <b>source asset</b> or load <b>sink asset</b> , unless the <b>pool participant</b> has submitted an <b>acceptable operational reason</b> with the <b>offer</b> .	
		<b>Operating Constraints for Offers</b>	
7	(1)	<p>A <b>pool participant</b> that submits an <b>offer</b> must also submit the following operating constraints:</p> <p>(a) for a generating <b>source asset</b> or a load <b>sink asset</b>, a <b>ramp rate</b>;</p> <p>(b) for a generating <b>source asset</b> or a load <b>sink asset</b>, a ramp table in the manner the <b>ISO</b> specifies; and</p> <p>(c) for a generating <b>source asset</b>, the initial start-up time.</p>	The nature of the ramp table is authoritative and must be specified in the Rule.
7	(2)	A <b>pool participant</b> must submit to the <b>ISO</b> any changes to the operating constraints of a <b>source asset</b> or a load <b>sink asset</b> as soon as reasonably practicable.	
		<b>Bid Content</b>	
9	(1)	<p>A <b>pool participant</b> must include in each <b>operating block</b> in a <b>bid</b>:</p> <p>(a) a price in \$/MWh to the nearest cent per MWh which:</p> <p>(i) in the case of load <b>sink asset</b>, is greater than or equal to \$0.00 per</p>	



Section	Subsection	Proposed language	Stakeholder comments
		<p>MWh and less than or equal to \$999.99 per MWh; and</p> <p>(ii) in the case of export asset that has been only allocated 1 <b>operating block</b> in accordance with section 201.5 of the <b>ISO rules</b>, <i>Energy Market Block Allocation</i>, \$999.99 per MWh; and</p> <p>(iii) in the case of an export asset that has been allocated 7 <b>operating blocks</b> in accordance with section 201.5 of the <b>ISO rules</b>, <i>Energy Market Block Allocation</i>, is greater than or equal to \$0.00 per MWh and less than or equal to \$999.98 per MWh;</p> <p>(b) a quantity in MW.</p>	
9	(2)	A <b>pool participant</b> that submits a <b>bid</b> must ensure that the total MW in the <b>bid</b> do not exceed the peak load of the load <b>sink asset</b> .	

**Please provide your comments on the following (as set out in AUC Rule 017 s. 13(b-j)):**

Item #		Stakeholder comments
1	whether you agree that amended ISO rule – Section 203.1, <i>Offers and Bids for Energy</i> relates to the capacity market and why or why not	
2	whether you agree that amended ISO rule – Section 203.1, <i>Offers and Bids for Energy</i> should [or should not] be in effect for a fixed term and why or why not	
3	whether you understand and agree with the objective or purpose of amended ISO rule – Section 203.1, <i>Offers and Bids for Energy</i> and whether, in your view, Section 203.1, <i>Offers and Bids for Energy</i> meets the objective or purpose	
4	how, in your view, amended ISO rule – Section 203.1, <i>Offers and Bids for Energy</i> affects the performance of the capacity market and the electricity market	
5	your views on any analysis conducted or commissioned by the AESO supporting amended ISO rule – Section 203.1, <i>Offers and Bids for Energy</i>	
6	whether you agree with amended ISO rule – Section 203.1, <i>Offers and Bids for Energy</i> taken together with all ISO rules and in light of the principle of a fair, efficient and openly competitive market	
7	whether you would suggest any alternatives to amended ISO rule – Section 203.1, <i>Offers and Bids for Energy</i>	

Item #		Stakeholder comments
8	whether you agree that the proposed provisional rule supports ensuring a reliable supply of electricity at a reasonable cost to customers and why or why not	
9	whether you agree that the proposed provisional rule supports the public interest and why or why not	

***Please provide your views on the type of content that should be included in an information document associated with amended ISO rule – Section 203.1, Offers and Bids for Energy.***

## Proposed Amended ISO rule – Section 203.4, *Delivery Requirements for Energy*

<b>Period of Comment:</b>	September 7, 2018	through	September 28, 2018	<b>Contact:</b>	Mark Thompson
<b>Comments From:</b>	TransCanada Energy Ltd. (TCE)			<b>Phone:</b>	403-920-5005
<b>Date [yyyy/mm/dd]:</b>	2018-09-28			<b>Email:</b>	markj_thompson@transcanada.com

***Please provide comments relating to the subsection of the proposed amendments to the rule in the corresponding box. Please include any views on whether the language clearly articulates the requirement for either the AESO or a market participant, and provide any proposed alternative wording by blacklining the proposed language below.***

Section	Subsection	Proposed language	Stakeholder comments
		<b>Applicability</b>	
1		Section 203.4 applies to: <ul style="list-style-type: none"> <li>(a) a <b>pool participant</b> with a generating <b>source asset</b> that has an associated current <b>offer</b> when participating in the energy market; and</li> <li>(b) a <b>pool participant</b> with a load <b>sink asset</b> that has an associated current <b>offer</b> when participating in the energy market; and</li> <li>(c) <b>the ISO.</b></li> </ul>	
		<b>Requirements</b> <b>Compliance Responsibilities</b>	
2	(1)	A <b>pool participant</b> may only deliver energy to the <b>interconnected electric system</b> from a generating <b>source asset</b> pursuant to a <b>dispatch</b> or a <b>directive</b> the <b>ISO</b> issues.	
2	(2)	A <b>pool participant</b> must: <ul style="list-style-type: none"> <li>(a) operate its generating <b>source assets</b> or load <b>sink assets</b>, or cause them to be operated; and</li> <li>(b) respond to <b>dispatches</b> from the <b>ISO</b>,</li> </ul>	

Section	Subsection	Proposed language	Stakeholder comments
		using <b>good electric industry practice</b> , including the design, implementation and use of reasonable <b>dispatch</b> protocols, together with personnel and software systems designed to detect and address errors or omissions in a timely fashion.	
		<b>Steady State Compliance</b>	
3	(1)	Subject to subsection 3(3), a <b>pool participant</b> must not, during <b>steady state</b> , vary the average MW it delivers from a generating <b>source asset</b> or consumes from a load <b>sink asset</b> , in any <b>10 minute clock period</b> from the <b>dispatch</b> MW by more than the <b>allowable dispatch variance</b> .	
3	(2)	Subject to subsection 3(3), a <b>pool participant</b> that is supplying <b>regulating reserve</b> from a generating <b>source asset</b> or a load <b>sink asset</b> must ensure that the MW delivered in any <b>10 minute clock period</b> is: <ul style="list-style-type: none"> <li>(a) not less than the <b>dispatch</b> MW minus the <b>allowable dispatch variance</b>; and</li> <li>(b) not greater than the <b>dispatch</b> MW plus the <b>regulating reserve</b> plus the <b>allowable dispatch variance</b>.</li> </ul>	
3	(3)	A <b>pool participant</b> , after a load <b>sink asset</b> that is subject to a <b>dispatch</b> for 0 MW has met the requirements for the first <b>10 minute clock period</b> as described in subsections 3(1) and 3(2), is no longer subject to the requirements of subsections 3(1) and 3(2).	This section is unclear. Please clarify the intent of this subsection or provide an example in an information document.
		<b>Ramping Compliance</b>	
4	(1)	A <b>pool participant</b> must move the output of a generating <b>source asset</b> or the consumption of a load <b>sink asset</b> which is: <ul style="list-style-type: none"> <li>(a) the subject of a <b>dispatch</b>; and</li> <li>(b) <b>ramping</b></li> </ul> towards the MW level indicated in that <b>dispatch</b> within 10 minutes of the time specified in the <b>dispatch</b> but not prior to the time specified in the <b>dispatch</b> .	
4	(2)	A <b>pool participant</b> must ensure that each generating <b>source asset</b> or load <b>sink asset</b> reaches the MW specified in an energy market <b>dispatch</b> , plus or minus the <b>allowable dispatch variance</b> for that generating <b>source asset</b> or load <b>sink asset</b> in:	

Section	Subsection	Proposed language	Stakeholder comments
		<ul style="list-style-type: none"> <li>(a) no longer than the period of time calculated as follows:               <ul style="list-style-type: none"> <li>(i) divide the change in <b>dispatch</b> MW by the <b>ramp rate</b> the <b>pool participant</b> submits;</li> <li>(ii) add 40% of the time calculated in subsection 4(2)(a)(i) or 5 minutes, whichever is greater; and</li> <li>(iii) add the 10 minutes referred to in subsection 4(1); and</li> </ul> </li> <li>(b) no sooner than the period of time calculated as follows:               <ul style="list-style-type: none"> <li>(i) divide the change in <b>dispatch</b> MW by the <b>ramp rate</b> the <b>pool participant</b> submits; and</li> <li>(ii) subtract 40% of the time calculated in subsection 4(2)(b)(i) or 5 minutes, whichever is greater.</li> </ul> </li> </ul>	
		<b>Operational Deviation</b>	
5	(1)	A <b>pool participant</b> must, if a generating <b>source asset</b> or load <b>sink asset</b> experiences an <b>operational deviation</b> in excess of 50 MW, verbally inform the <b>ISO</b> as soon as practical of the occurrence of the <b>operational deviation</b> and provide a description of the cause if known.	Consideration should be given to other criteria, such as timing, that lead to operational deviations as defined in the glossary. The criteria relate to deviations other than just MW deviations.
5	(2)	A <b>pool participant</b> must inform the <b>ISO</b> of the information required under subsection 5(1) on a telephone line the <b>ISO</b> designates, which must contain a voice recording system.	
5	(3)	A <b>pool participant</b> must, if an <b>operational deviation</b> extends for 20 minutes or longer, submit an <b>available capability</b> restatement or MW restatement for the generating <b>source asset</b> or load <b>sink asset</b> that represents the operational capability of the generating <b>source asset</b> or load <b>sink asset</b> , and must do so no later than 20 minutes after the commencement of the <b>operational deviation</b> .	
		<b>Exceptions to Non-Compliance</b>	
6		Notwithstanding the provisions set out in subsections 3, 4 and 5, the <b>ISO</b> must not determine that a <b>pool participant</b> is non-compliant with a <b>dispatch</b> for a generating <b>source asset</b> or load <b>sink asset</b> if the <b>pool participant</b> has met its responsibilities as set	

Section	Subsection	Proposed language	Stakeholder comments
		<p>out in subsection 2 and 1 or more of the following circumstances occur:</p> <ul style="list-style-type: none"> <li>(a) the generating <b>source asset</b> or load <b>sink asset</b> is <b>ramping</b> into position to provide <b>operating reserve</b> in response to a <b>dispatch</b> in the 15 minutes before the time indicated in that <b>dispatch</b>;</li> <li>(b) the generating <b>source asset</b> is operating below the <b>minimum stable generation</b> level indicated in the Energy Trading System, but only if that generating <b>source asset</b> is: <ul style="list-style-type: none"> <li>(i) synchronizing and its <b>available capability</b> the <b>pool participant</b> submitted is equal to its <b>minimum stable generation</b> and it has received a <b>dispatch</b> for that quantity, in MW;</li> <li>(ii) going off line and its <b>available capability</b> the <b>pool participant</b> submitted is equal to 0 and it has received a <b>dispatch</b> for that quantity, in MW;</li> <li>(iii) unable to follow the <b>ramp rate</b> the <b>pool participant</b> submitted when its output is being increased to its <b>minimum stable generation</b> and the <b>pool participant</b> has submitted a verbal plan to the <b>ISO</b> indicating a proposal for <b>ramping to minimum stable generation</b>, which verbal plan must provide an estimate of the time required to achieve the <b>ramp rate</b> and be updated for deviations of greater than 30 minutes or 50 MW; or</li> <li>(iv) stopped at an output level not identified in the verbal plan referenced in subsection 6(1)(b)(iii) above, but which is below <b>minimum stable generation</b> for more than 30 minutes for an operational reason and the <b>pool participant</b> has submitted a restatement of the <b>available capability</b> accordingly;</li> </ul> </li> <li>(c) the generating <b>source asset</b> is responding to abnormal frequency through automatic <b>governor</b> or <b>governor system</b> action;</li> <li>(d) the load <b>sink asset</b> is responding to abnormal frequency;</li> <li>(e) an <b>operational deviation</b> has occurred and the <b>pool participant</b> has complied with subsection 5; and</li> </ul>	



Section	Subsection	Proposed language	Stakeholder comments
		<p>(f) energy is being delivered to the <b>interconnected electric system</b> from a generating <b>source asset</b> or load <b>sink asset</b> while it is being tested or commissioned or both, in accordance with applicable provisions of the <b>ISO rules</b>.</p>	
		<p><b>Concurrent Energy and Operating Reserve Requirements</b></p>	
7	(1)	<p>The <b>ISO</b> must, when assessing a <b>pool participant's</b> compliance with section 205.2 of the <b>ISO rules, Issuing Dispatches and Directives for Operating Reserve</b> in a situation where there are concurrent energy and <b>spinning reserve</b> requirements or energy and <b>supplemental reserve</b> requirements, consider the time of the energy <b>dispatch</b> to be:</p> <ul style="list-style-type: none"> <li>(a) 15 minutes after the <b>directive</b> for <b>spinning reserve</b> or <b>supplemental reserve</b> in the case of subsection 4(3); and</li> <li>(b) the time the <b>pool asset</b> is providing the amount of <b>real power</b> described in of section 205.5 of the <b>ISO rules, Spinning Reserve Technical Requirements and Performance Standards</b>, or section 205.6 of the <b>ISO rules, Supplemental Reserve Technical Requirements and Performance Standards</b>, in the case of subsection 4(4);</li> <li>(c) the later of 15 minutes after the <b>directive</b> for <b>spinning reserve</b> or <b>supplemental reserve</b> or the time of the <b>dispatch</b> in the case of subsection 4(5); and</li> <li>(d) the time the <b>pool asset</b> is providing the amount of <b>real power</b> described in of section 205.5 of the <b>ISO rules, Spinning Reserve Technical Requirements and Performance Standards</b>, or section 205.6 of the <b>ISO rules, Supplemental Reserve Technical Requirements and Performance Standards</b>, in the case of subsection 4(6).</li> </ul>	
7	(2)	<p>The <b>ISO</b> must, when assessing a <b>pool participant's</b> compliance with section 205.2 of the <b>ISO rules, Issuing Dispatches and Directives for Operating Reserve</b> in a situation where there are concurrent energy and <b>spinning reserve</b> requirements or energy and <b>supplemental reserve</b> requirements, consider the MW quantity to be the energy <b>dispatch</b> quantity plus the <b>spinning reserve</b> or <b>supplemental reserve</b> quantity while the <b>directive</b> remains in effect.</p>	

**Please provide your comments on the following (as set out in AUC Rule 017 s. 13(b-j)):**

Item #		Stakeholder comments
1	whether you agree that amended ISO rule – Section 203.4, <i>Delivery Requirements for Energy</i> relates to the capacity market and why or why not	
2	whether you agree that amended ISO rule – Section 203.4, <i>Delivery Requirements for Energy</i> should [or should not] be in effect for a fixed term and why or why not	
3	whether you understand and agree with the objective or purpose of amended ISO rule – Section 203.4, <i>Delivery Requirements for Energy</i> and whether, in your view, Section 203.4, <i>Delivery Requirements for Energy</i> meets the objective or purpose	
4	how, in your view, amended ISO rule – Section 203.4, <i>Delivery Requirements for Energy</i> affects the performance of the capacity market and the electricity market	
5	your views on any analysis conducted or commissioned by the AESO supporting amended ISO rule – Section 203.4, <i>Delivery Requirements for Energy</i>	
6	whether you agree with amended ISO rule – Section 203.4, <i>Delivery Requirements for Energy</i> taken together with all ISO rules and in light of the principle of a fair, efficient and openly competitive market	
7	whether you would suggest any alternatives to amended ISO rule – Section 203.4, <i>Delivery Requirements for Energy</i>	

Item #		Stakeholder comments
8	whether you agree that the proposed provisional rule supports ensuring a reliable supply of electricity at a reasonable cost to customers and why or why not	
9	whether you agree that the proposed provisional rule supports the public interest and why or why not	

***Please provide your views on the type of content that should be included in an information document associated with amended ISO rule – Section 203.4, Delivery Requirements for Energy.***

[Empty response box]

Proposed New ISO rule – Section 203.5, *Energy Market Mitigation*

<b>Period of Comment:</b>	September 7, 2018	through	September 28, 2018	<b>Contact:</b>	Mark Thompson
<b>Comments From:</b>	TransCanada Energy Ltd. (TCE)			<b>Phone:</b>	403-920-5005
<b>Date [yyyy/mm/dd]:</b>	2018-09-28			<b>Email:</b>	markj_thompson@transcanada.com

***Please provide comments relating to the subsection of the proposed rule in the corresponding box. Please include any views on whether the language clearly articulates the requirement for either the AESO or a market participant, and provide any proposed alternative wording by blacklining the proposed language below.***

Section	Subsection	Proposed language	Stakeholder comments
		<b>Applicability</b>	
1		Section 203.5 applies to: <ul style="list-style-type: none"> <li>(a) a <b>pool participant</b> that submit <b>offers</b> in the energy market for a <b>source asset</b> ;</li> <li>(b) the <b>legal owner</b> of a <b>generating unit</b> or <b>aggregated generating facility</b>; and</li> <li>(c) the <b>ISO</b>.</li> </ul>	
		<b>Requirements</b> <b>Expected Supply Cushion for Mitigation</b>	
2	(1)	The <b>ISO</b> must: <ul style="list-style-type: none"> <li>(a) publish the method for calculating the expected supply cushion on the AESO website; and</li> <li>(b) provide 120 days' notice notice to <b>pool participant</b> before changing to the method for calculating the expected supply cushion published in accordance with subsection 2(1)(a).</li> </ul>	The calculation of the supply cushion is a critical component of the energy market mitigation framework. The method for calculating the supply cushion is authoritative and should be under the purview of the Commission.
2	(2)	The <b>ISO</b> must, for each <b>settlement interval</b> :	In subsection 2(2)(d), the supply cushion for the hour should be calculated as close to the settlement interval as reasonably practicable to ensure that the calculation reflects actual

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		<ul style="list-style-type: none"> <li>(a) calculate the expected supply cushion using the method published in accordance with subsection 2(1)(a);</li> <li>(b) publish the expected supply cushion on the AESO website prior to the <b>settlement interval</b>;</li> <li>(c) update the expected supply cushion as soon as reasonably practicable upon a change to 1 or more of the inputs to the calculation of the expected supply cushion;</li> <li>(d) select a value of the expected supply cushion observed during the two hours immediately prior to the <b>settlement interval</b>;</li> <li>(e) publish the value of the expected supply cushion which is selected for each <b>settlement interval</b> under subsection 2(2)(d) as soon as reasonably practicable after such selection is made.</li> </ul>	<p>conditions to the greatest extent possible.</p>
		<b>Asset-Specific Cost Information –Generating Unit or Aggregated Generating Facility</b>	
3	(1)	<p>A <b>pool participant</b> must submit to the <b>ISO</b>, in the manner the <b>ISO</b> specifies, the following cost information related to the short-run marginal costs for a thermal <b>generating unit or aggregated generating facility</b>:</p> <ul style="list-style-type: none"> <li>(a) heat rate;</li> <li>(b) if the <b>source asset</b>'s fuel is not natural gas, fuel cost;</li> <li>(c) financial exposure to greenhouse gas emissions costs; and</li> <li>(d) any further cost information the <b>ISO</b> specifies.</li> </ul>	<p>TCE submits that new subsections (e) and (f) should be added with the following language:</p> <ul style="list-style-type: none"> <li>(e) the estimated variable operations and maintenance cost; and</li> <li>(f) any further cost information the market participant considers relevant.</li> </ul> <p>In TCE's view, flexibility is required for participants to define their costs and therefore included costs cannot be entirely at the discretion of the AESO.</p>
3	(2)	<p>A <b>pool participant</b> must, in relation to the cost information submitted pursuant to subsection 3(1):</p> <ul style="list-style-type: none"> <li>(a) submit the cost information to the <b>ISO</b>: <ul style="list-style-type: none"> <li>(i) for a <b>generating unit or aggregated generating facility</b> that has energized and commissioned, on or before a date the <b>ISO</b> specifies; or</li> <li>(ii) for a <b>generating unit or aggregated generating facility</b> that has not</li> </ul> </li> </ul>	

Section	Subsection	Proposed language	Stakeholder comments
		<p>completed energization and <b>commissioning</b>, before the energization and <b>commissioning</b> of such <b>generating unit</b> or <b>aggregated generating facility</b>.</p> <p>(b) determine the values of such cost information assuming that the <b>generating unit</b> or <b>aggregated generating facility</b> is operating under normal operating conditions at <b>maximum capability</b>; and</p> <p>(c) submit updated cost information to the <b>ISO</b> as soon as reasonably practicable upon becoming aware of any material change in the cost information submitted in accordance with subsection 3(1).</p> <p>(d) an attestation by a corporate officer of the <b>pool participant</b> that the cost information provided pursuant to subsection 3(1) is complete and accurate.</p>	
3	(3)	The <b>ISO</b> may, with respect to cost information submitted pursuant to subsection 3(1), exclude costs determined by the <b>ISO</b> to be unreasonable.	
3	(4)	The <b>ISO</b> must select alternate values for the cost information submitted pursuant to subsection 3(1) if such costs have been excluded pursuant to subsection 3(3).	
3	(5)	<p>The <b>ISO</b> must:</p> <p>(a) identify the current carbon price from the appropriate public authority;</p> <p>(b) identify the natural gas price for each <b>day</b> on a day-ahead basis, or as close to a day-ahead basis as reasonably practicable; and</p> <p>(c) estimate the variable operations and maintenance costs for a <b>generating unit</b> or <b>aggregated generating facility</b> on a class-specific basis.</p>	What if spot gas materially deviates from day ahead due to a pipeline force majeure for example? A process must exist to allow generators to apply for uplift payments to cover any such losses that may occur due to this deviation.
		<b>Asset-Specific Reference Price – Generating Unit or Aggregated Generating Facility</b>	
4	(1)	The <b>ISO</b> must, using the cost information derived pursuant to subsection 3, calculate an estimated short-run marginal cost for producing power, measured in dollars per MWh, for each <b>generating unit</b> or <b>aggregated generating facility</b> for each <b>settlement interval</b> as a sum of the following:	

Section	Subsection	Proposed language	Stakeholder comments
		<ul style="list-style-type: none"> <li>(a) the heat rate multiplied by the fuel price, if applicable;</li> <li>(b) the exposure to greenhouse gas emissions costs multiplied by the carbon price from the appropriate public authority, if applicable; and</li> <li>(c) the estimated variable operations and maintenance cost.</li> </ul>	
4	(2)	<p>The <b>ISO</b> must, using the estimated short-run marginal costs derived pursuant to subsection 4(1), set the asset-specific reference price for each <b>generating unit or aggregated generating facility</b> for each <b>settlement interval</b> as an amount equal to:</p> <ul style="list-style-type: none"> <li>(a) the estimated short run marginal cost multiplied by 3, if the expected supply cushion selected for the <b>settlement interval</b> under subsection 2(2)(d) is 1,000 MW or greater;</li> <li>(b) the estimated short run marginal cost multiplied by 6, if the expected supply cushion selected for the <b>settlement interval</b> under subsection 2(2)(d) is 250 MW or greater and less than 1,000 MW; and</li> <li>(c) the maximum permissible price for an <b>offer</b> made under section 203.1 of the <b>ISO rules, Offers and Bids for Energy</b>, if the expected supply cushion selected for the <b>settlement interval</b> under subsection 2(2)(d) is less than 250 MW.</li> </ul>	<p>TCE notes that these proposed mitigation levels are similar to other markets and have been developed through extensive consultation with industry. It is important to recognize that under the proposed framework Alberta generators must self-commit, there is no ORDC, and there is little to no congestion. Further, value in the energy market for the actual delivery of power in real-time is a far more effective price signal than value in the capacity market. Accordingly, an ex-ante mitigation framework that mitigates to 1x variable cost would not be efficient given the overall capacity market design.</p> <p>On balance, less mitigation is preferred to more in the energy market. This has the effect of rewarding real-time performance and sending strong signals for the value of energy under tight market conditions. Proposals that minimize the real-time price signals are not expected to result in lower overall prices – they simply move value towards the capacity market and away from the energy market. As such, TCE supports a no-look threshold of 500 MW as has previously been proposed to reflect that the system is within a single forced outage of an emergency event (<i>i.e.</i>, there is scarcity in the market). Eliminating the ability to signal scarcity prior to actual emergencies erodes the value of that price and simply moves value to the capacity market.</p>
		<p><b>Asset-Specific Reference Price – Prescribed Non-Thermal Generating Source Assets Capable of Storing Energy</b></p>	
5	(1)	<p>The <b>ISO</b> may prescribe a set of non-thermal generating <b>source assets</b> to which this subsection 5 is applicable, provided that each generating <b>source asset</b> is capable of storing its fuel.</p>	
5	(2)	<p>The <b>ISO</b> must, if the <b>ISO</b> prescribes a set of generating <b>source assets</b> in accordance with subsection 5(1) publish the list of such prescribed generating <b>source assets</b> on the AESO website.</p>	



Section	Subsection	Proposed language	Stakeholder comments
5	(3)	<p>The <b>ISO</b> must, subject to subsection 5(4), set the asset-specific reference price for generating <b>source assets</b> prescribed pursuant to subsection 5(1) for each <b>settlement interval</b> as an amount equal to:</p> <ul style="list-style-type: none"> <li>(a) the 30-day rolling average <b>pool price</b> most recently published by the <b>ISO</b> multiplied by 3, if the expected supply cushion selected for the <b>settlement interval</b> under subsection 2(2)(d) is 1,000 MW or greater;</li> <li>(b) the 30-day rolling average <b>pool price</b> most recently published by the <b>ISO</b> multiplied by 6, if the expected supply cushion selected for the <b>settlement interval</b> under subsection 2(2)(d) is 250 MW or greater and less than 1,000 MW; and</li> <li>(c) the maximum permissible price for an <b>offer</b> made under section 203.1 of the <b>ISO rules, Offers and Bids for Energy</b>, if the expected supply cushion selected for the <b>settlement interval</b> under subsection 2(2)( d) is less than 250 MW.</li> </ul>	
5	(4)	<p>Notwithstanding subsection 5(3), if a <b>pool participant</b>, for any generating <b>source asset</b> prescribed pursuant to subsection 5(1) for a <b>settlement interval</b>, has satisfied the asset-specific requirements for participation in the <b>ancillary services</b> market referred to in subsection 5(5), then the <b>ISO</b> must, set the asset-specific reference price for such generating <b>source asset</b> for the <b>settlement interval</b> as an amount equal to the maximum permissible price for an <b>offer</b> made under Section 203.1 of the <b>ISO rules, Offers and Bids for Energy</b>.</p>	
5	(5)	<p>The <b>ISO</b> must:</p> <ul style="list-style-type: none"> <li>(a) publish the asset-specific requirements for participation in the <b>ancillary services</b> market on the AESO website; and</li> <li>(b) provide 120 days' notice to <b>pool participants</b> before changing to the asset-specific requirements published in accordance with subsection 5(5)(a).</li> </ul>	
		<p><b>Asset-Specific Reference Price – Import Source Assets</b></p>	
6	(1)	<p>The <b>ISO</b> must set the asset-specific reference price for each import <b>source asset</b> for each</p>	

Section	Subsection	Proposed language	Stakeholder comments
		<p><b>settlement interval</b> as an amount equal to:</p> <ul style="list-style-type: none"> <li>(a) <math>MidC(on\ peak) + \min\{100, 3 * MidC(on\ peak)\}</math>, if the expected supply cushion selected for the <b>settlement interval</b> under subsection 2(2)(d) is 1,000 MW or greater;</li> <li>(b) <math>MidC(on\ peak) + \min\{100, 6 * MidC(on\ peak)\}</math>, if the expected supply cushion selected for the <b>settlement interval</b> under subsection 2(2)(d) is 250 MW or greater and less than 1,000 MW;</li> </ul> <p>where <i>MidC(on peak)</i> is the day-ahead, on-peak price in the Mid-Columbia market for delivery on the same <b>day</b> as the energy market in Alberta;</p> <p>or</p> <ul style="list-style-type: none"> <li>(c) the maximum permissible price for an <b>offer</b> made under section 203.1 of the <b>ISO rules</b>, <i>Offers and Bids for Energy</i>, if the expected supply cushion selected for the <b>settlement interval</b> under subsection 2(1)(d) is less than 250 MW.</li> </ul>	
		<p><b>Asset-Specific Reference Price – Limitations and Exemptions</b></p>	
7	(1)	<p>Notwithstanding subsections 4, 5 and 6, the <b>ISO</b> must not set the asset-specific reference price for any <b>source asset</b> for any <b>settlement interval</b> as an amount:</p> <ul style="list-style-type: none"> <li>(a) less than \$25/MWh; or</li> <li>(b) greater than the maximum permissible price for an <b>offer</b> made under section 203.1 of the <b>ISO rules</b>, <i>Offers and Bids for Energy</i>.</li> </ul>	
7	(2)	<p>A <b>pool participant</b> may request that the <b>ISO</b> provide a variance from any asset-specific reference price determined pursuant to subsections 4, 5, or 6.</p>	
7	(3)	<p>The <b>ISO</b> may, upon receiving a request pursuant to subsection 7(2), assign a different asset-specific reference price determined pursuant to subsections 4, 5, or 6 if the <b>ISO</b> is satisfied that the <b>pool participant</b> would not be able to reasonably recover the short run marginal costs and cycling costs of the <b>source asset</b> within the scope of the asset-specific reference price determined pursuant to subsections 4, 5, or 6.</p>	

Section	Subsection	Proposed language	Stakeholder comments
		<b>Market Power Screen</b>	
8	(1)	The <b>ISO</b> must identify those <b>persons</b> , using the methodology for the calculation of market share offer control described in section 5 of the <i>Fair, Efficient, and Open Competition Regulation</i> , that have offer control over one or more <b>source assets</b> for the purposes of identifying a <b>person</b> as having market power.	
8	(2)	The <b>person</b> identified under subsection 8(1) may submit to the <b>ISO</b> , in the manner the <b>ISO</b> specifies, <b>supply obligations</b> in MW for each <b>settlement interval</b> , at least 2 hours prior to the start of the <b>settlement interval</b> , for the purposes of the expected residual supply index.	
8	(3)	A <b>person</b> who submits <b>supply obligations</b> in accordance with subsection 8(2) must submit a value that is equal to or less than the <b>person's</b> actual <b>supply obligations</b> .	
8	(4)	The <b>ISO</b> must, for each <b>person</b> identified under subsection 8(1) and in the <b>offer control information</b> for an <b>operating block</b> in respect of a <b>settlement interval</b> , calculate a value called the expected residual supply index for each <b>settlement interval</b> for the <b>person</b> identified under subsection 8(1) as follows:  <ul style="list-style-type: none"> <li>(a) the expected supply from all <b>source assets</b> for the <b>settlement interval</b>;</li> <li>(b) minus the expected supply from all <b>source assets</b> under the offer control of a <b>person</b> identified under subsection 8(1), net of the <b>supply obligations</b> of the <b>person</b> identified under subsection 8(1), for the <b>settlement interval</b>; and</li> <li>(c) divided by expected demand from all <b>sink assets</b> for the <b>settlement interval</b>.</li> </ul>	TCE recommends that this should be replaced by the formula expressed in CMD Final.
8	(5)	The <b>ISO</b> must select the expected residual supply index referenced in subsection 8(1) during the 2 hours immediately prior to the <b>settlement interval</b> .	
8	(6)	The <b>ISO</b> must identify a <b>person</b> with a expected residual supply index of less than 1 for a given <b>settlement interval</b> as having market power in that <b>settlement interval</b> .	
8	(7)	The <b>ISO</b> must not reconsider the conclusion drawn under subsection 8(4) if market conditions change at any time after the expected residual supply index is selected for the	

Section	Subsection	Proposed language	Stakeholder comments
		<b>settlement interval</b> under subsection 8(3).	
		<b>Mitigation of Market Power</b>	
9	(1)	The <b>ISO</b> must, for each <b>settlement interval</b> , identify each <b>operating block</b> associated with a <b>source asset</b> under the offer control of a <b>person</b> identified under subsection 8(4) that has an <b>offer price</b> that is greater than the asset-specific reference price of the related <b>source asset</b> which was determined pursuant to subsections 4, 5, or 6.	
9	(2)	Subject to subsection 9(3), the <b>ISO</b> must change the <b>offer price</b> of an <b>operating block</b> identified under subsection 9(1) to the asset-specific reference price of the associated <b>source asset</b> as determined under subsection 4, 5 or 6 if the <b>operating block</b> is: <ul style="list-style-type: none"> <li>(a) controlled by a single <b>person</b> that has been identified as having market power under subsection 8(4),</li> <li>(b) controlled by multiple <b>persons</b> which have all been identified as having market power under subsection 8(4), or</li> <li>(c) declared to be inflexible in accordance with Section 203.1 of the <b>ISO rules, Offers and Bids for Energy</b>, and is at least partially controlled by a <b>person</b> that has been identified as having market power under subsection 8(4).</li> </ul>	
9	(3)	The <b>ISO</b> must, if an <b>operating block</b> identified under subsection 9(1) is declared to be flexible under Section 203.1 of the <b>ISO rules, Offers and Bids for Energy</b> , and is partially, but not fully, controlled by one or more <b>person</b> identified as having market power under subsection 8(4), split the existing <b>operating block</b> into two <b>operating blocks</b> as follows: <ul style="list-style-type: none"> <li>(a) create a new <b>operating block</b> that contains the quantity of the existing <b>operating block</b> that is controlled by the <b>person</b> identified as having market power under subsection 8(4) and select an <b>offer price</b> equal to the asset-specific reference price of the associated <b>source asset</b>; and</li> <li>(b) reduce the quantity of the existing <b>operating block</b> by the quantity of the newly created <b>operating block</b>, with no associated change made to the <b>offer price</b> of the <b>operating block</b>.</li> </ul>	

Section	Subsection	Proposed language	Stakeholder comments
		<b>Timely Information from Legal Owner</b>	
10		<p>A <b>legal owner</b> of a <b>generating unit or aggregated generating facility</b> must, if it is not the <b>pool participant</b> for that <b>generating unit or aggregated generating facility</b>:</p> <ul style="list-style-type: none"> <li>(a) provide such timely and complete information to the pool participant for such source asset to enable the pool participant to comply with its obligations under subsection 3; and</li> <li>(b) provide an attestation to the <b>pool participant</b> from a corporate officer of the <b>legal owner</b> of such <b>generating unit or aggregated generating facility</b> to enable the <b>pool participant</b> to comply with its obligations under subsection 3(2)d.</li> </ul>	

**Please provide your comments on the following (as set out in AUC Rule 017 s. 13(b-j)):**

Item #		Stakeholder comments
1	whether you agree that the proposed new ISO Rule – Section 203.5, <i>Energy Market Mitigation</i> relates to the capacity market and why or why not	
2	whether you agree that the proposed new ISO Rule – Section 203.5, <i>Energy Market Mitigation</i> should [or should not] be in effect for a fixed term and why or why not	
3	whether you understand and agree with the objective or purpose of the proposed new ISO Rule – Section 203.5, <i>Energy Market Mitigation</i> and whether, in your view, the proposed new ISO Rule – Section 203.5, <i>Energy Market Mitigation</i> meets the objective or purpose	
4	how, in your view, the proposed new ISO Rule – Section 203.5, <i>Energy Market Mitigation</i> affects the performance of the capacity market and the electricity market	
5	your views on any analysis conducted or commissioned by the AESO supporting the proposed new ISO Rule – Section 203.5, <i>Energy Market Mitigation</i>	
6	whether you agree with the proposed new ISO Rule – Section 203.5, <i>Energy Market Mitigation</i> taken together with all ISO rules and in light of the principle of a fair, efficient and openly competitive market	
7	whether you would suggest any alternatives to the proposed new ISO Rule – Section 203.5, <i>Energy Market Mitigation</i>	

Item #		Stakeholder comments
8	whether you agree that the proposed provisional rule supports ensuring a reliable supply of electricity at a reasonable cost to customers and why or why not	
9	whether you agree that the proposed provisional rule supports the public interest and why or why not	

*Please provide your views on the type of content that should be included in an information document associated with the proposed new ISO Rule – Section 203.5, Energy Market Mitigation.*



Proposed Amended ISO rule – Section 203.6, *Market Requirements for Interchange Transactions*

<b>Period of Comment:</b>	September 7, 2018	through	September 28, 2018	<b>Contact:</b>	Mark Thompson
<b>Comments From:</b>	TransCanada Energy Ltd. (TCE)			<b>Phone:</b>	403-920-5005
<b>Date [yyyy/mm/dd]:</b>	2018-09-28			<b>Email:</b>	markj_thompson@transcanada.com

***Please provide comments relating to the subsection of the proposed amendments to the rule in the corresponding box. Please include any views on whether the language clearly articulates the requirement for either the AESO or a market participant, and provide any proposed alternative wording by blacklining the proposed language below.***

Section	Subsection	Proposed language	Stakeholder comments
		<b>Applicability</b>	
		Section 203.6 applies to: (a) a <b>pool participant</b> seeking to exchange or transact an import or export <b>interchange transaction</b> in the energy market or <b>ancillary services</b> market; and (b) the <b>ISO</b> .	
		<b>Requirements</b>	
2	(1)	A <b>pool participant</b> must submit an <b>offer</b> or <b>bid</b> for a <b>settlement interval</b> in the energy market or <b>ancillary services</b> market in order to initiate an <b>interchange transaction</b> .	
2	(2)	A <b>pool participant</b> that submits <b>offers</b> that are priced greater than or equal to \$0.01, or <b>bids</b> that are priced less than or equal to \$999.98 in the energy market in accordance with Section 203.1 of the <b>ISO rules</b> , <i>Offers and Bids for Energy</i> , or an <b>offer</b> in the <b>ancillary services</b> market, must initiate an <b>interchange transaction</b> only pursuant to a <b>dispatch</b> that the <b>ISO</b> issues.	The Rule states that a pool participant must not "initiate an interchange transaction" unless it has received a dispatch. The AESO should define what "initiate an interchange transaction" includes. It would be problematic if this were to include the procuring or reserving or transmission since these activities must be done prior to the top of the hour in neighbouring jurisdictions.

Section	Subsection	Proposed language	Stakeholder comments
2	(3)	A <b>pool participant</b> that submits a \$0.00 import <b>offer</b> or \$999.99 export <b>bid</b> for a <b>settlement interval</b> in the energy market must initiate an <b>interchange transaction</b> for the start of the <b>settlement interval</b> in accordance with this section 203.6.	
		<b>Procurement of Transmission Service by a Pool Participant</b>	
3	(1)	A <b>pool participant</b> that initiates an <b>interchange transaction</b> must use all reasonable efforts to procure transmission service from applicable transmission service providers in an amount in MW at least equal to the <b>dispatch</b> volume in accordance with subsection 2(2) or in accordance with its submission volume in subsection 2(3), which reasonable efforts must include: <ul style="list-style-type: none"> <li>(a) determining whether there is transmission service posted by the applicable transmission service providers and available for that <b>interchange transaction</b>; and</li> <li>(b) submitting a request to the applicable transmission service providers to procure the transmission service, if it has been posted and is available.</li> </ul>	Pool participants should be required to procure transmission at least equal to its submission volume in relation to both sections 2(2) and 2(3). In neighbouring jurisdictions transmission must be procured in advance of the hour. A pool participant may be unable to procure or reserve transmission for the hour if it waits to receive a dispatch.
		<b>Submission of E-tags by Pool Participants</b>	
4	(1)	A <b>pool participant</b> with any import or export <b>interchange transactions</b> who has acquired transmission service must submit or adjust 1 or more <b>e-tags</b> to the <b>ISO</b> for the <b>interchange transactions</b> .	
4	(2)	A <b>pool participant</b> subject to an energy market <b>dispatch</b> in accordance with subsection 2(2) must submit or adjust an <b>e-tag</b> as soon as reasonably practicable with a start time that is: <ul style="list-style-type: none"> <li>(a) equal to or later than the time the e-tag is submitted or adjusted, but no earlier than the effective time of the <b>dispatch</b>; and</li> <li>(b) as soon as reasonably practicable, but no later than 40 minutes after the instruction time of the <b>dispatch</b>.</li> </ul>	The AESO should clarify when a price import transaction would receive a dispatch effective at the top of the hour.
4	(3)	A <b>pool participant</b> that submits an <b>offer</b> or <b>bid</b> in accordance with subsection 2(3) must submit or adjust <b>e-tags</b> no later than the start of the <b>settlement interval</b> and with a start	

Section	Subsection	Proposed language	Stakeholder comments
		time that is equal to the start of the <b>settlement interval</b> .	
4	(4)	A <b>pool participant</b> must, when submitting or adjusting an <b>e-tag</b> , identify within the <b>e-tag</b> the corresponding <b>pool ID</b> and any other information the <b>ISO</b> specifies.	
4	(5)	<p>A <b>pool participant</b> must submit or adjust 1 or more <b>e-tags</b> for an <b>interchange transaction</b> such that the MW indicated in the <b>e-tags</b> aligns with:</p> <ul style="list-style-type: none"> <li>(a) the <b>dispatch</b> volume indicated in subsection 2(2) for the <b>pool asset</b>, or as otherwise set out in the <b>ISO rules</b>; or</li> <li>(b) the submission volume indicated in subsection 2(3) as stated at 2 hours prior to the start of the <b>settlement interval</b> for the <b>pool asset</b>, unless a restatement has been made in accordance with the provisions of this section 203.6, or as otherwise set out in the <b>ISO rules</b>.</li> </ul> <p><b>[Note to draft: The content in subsection 4(5) is currently under further consideration by the AESO]</b></p>	
		<b>Restatements</b>	
5	(1)	<p>If, after complying with subsection 3 the <b>pool participant</b> is unable to procure all or a portion of the requested transmission service, or the transmission service is curtailed by any transmission service provider other than the <b>ISO</b>, then the <b>pool participant</b> must submit, as applicable:</p> <ul style="list-style-type: none"> <li>(a) an energy restatement in accordance with Section 203.3 of the <b>ISO rules</b>, <i>Energy Restatements</i>; or</li> <li>(b) an <b>ancillary services</b> restatement in accordance with Section 205.3 of the <b>ISO rules</b>, <i>Restatements for Operating Reserve</i>.</li> </ul>	
		<b>Validation of E-Tags by the ISO</b>	
6	(1)	The <b>ISO</b> must validate an <b>e-tag</b> in order to maintain <b>reliability</b> and market operations under the existing <b>ISO rules</b> .	

Section	Subsection	Proposed language	Stakeholder comments
6	(2)	<p>The ISO may deny an <b>e-tag</b> if:</p> <ul style="list-style-type: none"> <li>(a) the <b>e-tag</b> is incomplete or incorrect;</li> <li>(b) the <b>interchange transaction</b> is not being transacted by a <b>pool participant</b>;</li> <li>(c) the <b>e-tag</b> does not comply with subsection 4; or</li> <li>(d) required for the reliable operation of the <b>interconnected electric system</b>.</li> </ul>	

**Please provide your comments on the following (as set out in AUC Rule 017 s. 13(b-j)):**

Item #		Stakeholder comments
1	whether you agree that amended ISO rule – Section 203.6, <i>Market Requirements for Interchange Transactions</i> relates to the capacity market and why or why not	
2	whether you agree that amended ISO rule – Section 203.6, <i>Market Requirements for Interchange Transactions</i> should [or should not] be in effect for a fixed term and why or why not	
3	whether you understand and agree with the objective or purpose of amended ISO rule – Section 203.6, <i>Market Requirements for Interchange Transactions</i> and whether, in your view, Section 203.6, <i>Market Requirements for Interchange Transactions</i> meets the objective or purpose	
4	how, in your view, amended ISO rule – Section 203.6, <i>Market Requirements for Interchange Transactions</i> affects the performance of the capacity market and the electricity market	
5	your views on any analysis conducted or commissioned by the AESO supporting amended ISO rule – Section 203.6, <i>Market Requirements for Interchange Transactions</i>	
6	whether you agree with amended ISO rule – Section 203.6, <i>Market Requirements for Interchange Transactions</i> taken together with all ISO rules and in light of the principle of a fair, efficient and openly competitive market	

Item #		Stakeholder comments
7	whether you would suggest any alternatives to amended ISO rule – Section 203.6, <i>Market Requirements for Interchange Transactions</i>	
8	whether you agree that the proposed provisional rule supports ensuring a reliable supply of electricity at a reasonable cost to customers and why or why not	
9	whether you agree that the proposed provisional rule supports the public interest and why or why not	

***Please provide your views on the type of content that should be included in an information document associated with amended ISO rule – Section 203.6, Market Requirements for Interchange Transactions.***

Empty response box for stakeholder comments.

Proposed Amended ISO rule – Section 206.1, Qualification of Capacity

**Period of Comment:** September 7, 2018 through September 28, 2018      **Contact:** Mark Thompson  
**Comments From:** TransCanada Energy Ltd. (TCE)      **Phone:** 403-920-5005  
**Date [yyyy/mm/dd]:** 2018-09-28      **Email:** markj\_thompson@transcanada.com

***Please provide comments relating to the subsection of the proposed amendments to the rule in the corresponding box. Please include any views on whether the language clearly articulates the requirement for either the AESO or a market participant, and provide any proposed alternative wording by blacklining the proposed language below.***

Section	Subsection	Proposed language	Stakeholder comments
		<b>Declaration for New Capacity</b>	
3		<p>A <b>person</b> must, within the timelines prescribed by the <i>Capacity Market Auction Guidelines</i> and in the manner the <b>ISO</b> specifies, submit to the <b>ISO</b> an attestation from a corporate officer as to whether an asset with the <b>new capacity</b> will:</p> <ul style="list-style-type: none"> <li>(a) permanently delist in accordance with Section 201.15, <i>Delisting</i>; or</li> <li>(b) continue to participate in the energy and capacity markets,</li> </ul> <p>in the event that the <b>capacity market participant</b> fails to receive a <b>capacity commitment</b> for such asset in the <b>base auction</b> or <b>rebalancing auction</b>.</p>	The timelines should not be noted in guidelines, but rather should be included directly in this rule. This provides investor certainty as the timelines cannot then be easily changed by the AESO.
		<b>Declarations for Incremental Capacity and Refurbished Capacity</b>	
4	(1)	<p>A <b>capacity market participant</b> must, if it has applied to provide proposed incremental capacity, submit to the <b>ISO</b>, within the timelines prescribed by the <i>Capacity Market Auction Guidelines</i> and in the manner the <b>ISO</b> specifies, an attestation from a corporate officer as to whether the anticipated <b>maximum capability</b> of the asset with incremental capacity will be either:</p> <ul style="list-style-type: none"> <li>(a) the <b>maximum capability</b> of the asset had the <b>capacity market participant</b> not applied for proposed incremental capacity; or</li> </ul>	



Section	Subsection	Proposed language	Stakeholder comments
		<p>(b) remain as the anticipated <b>maximum capability</b> accounting for the proposed incremental capacity,</p> <p>in the event that the <b>capacity market participant</b> fails to receive a <b>capacity commitment</b> for such asset in the <b>base auction</b> or <b>rebalancing auction</b> for some or all of the proposed incremental capacity.</p>	
4	(2)	<p>A <b>capacity market participant</b> must, within the timelines prescribed by the <i>Capacity Market Auction Guidelines</i> and in the manner the <b>ISO</b> specifies, submit to the <b>ISO</b> an attestation from a corporate officer as to whether an asset with refurbished capacity will:</p> <p>(a) permanently delist in accordance with Section 201.15 of the <b>ISO rules</b>, <i>Delisting</i>; or</p> <p>(b) continue to participate in the energy market and capacity market,</p> <p>in the event that the <b>capacity market participant</b> fails to receive a <b>capacity commitment</b> for such asset in the <b>base auction</b> or <b>rebalancing auction</b>.</p>	
		<p><b>Declaration for Load Asset</b></p>	
5	(1)	<p>A <b>person</b> must, within the timelines prescribed by the <i>Capacity Market Auction Guidelines</i> and in the manner the <b>ISO</b> specifies, declare to the <b>ISO</b> a <b>firm consumption level</b> if the <b>person</b> is seeking to have the <b>ISO</b> qualify a load asset providing a <b>firm consumption level</b> for the capacity market.</p>	
5	(2)	<p>A <b>person</b> must, within the timelines prescribed by the <i>Capacity Market Auction Guidelines</i> and in the manner the <b>ISO</b> specifies, declare to the <b>ISO</b> a <b>guaranteed load reduction</b> if the <b>person</b> is seeking to have the <b>ISO</b> qualify a load asset providing a <b>guaranteed load reduction</b> for the capacity market.</p>	
		<p><b>Declaration for Import Asset</b></p>	
6		<p>A <b>person</b> must, within the timelines prescribed by the <i>Capacity Market Auction Guidelines</i> and in the manner the <b>ISO</b> specifies, declare to the <b>ISO</b> a volume in MW from an import asset, which is less than or equal to the amount of firm transmission, that the <b>person</b> is seeking to have the <b>ISO</b> qualify for the capacity market.</p>	

Section	Subsection	Proposed language	Stakeholder comments
		<p><b>Qualification of New Capacity, Incremental Capacity and Refurbished Capacity</b></p>	
7	(1)	<p>The <b>ISO</b> must, based on the information in the application and any supporting documents provided pursuant to subsection 2, be satisfied that the asset:</p> <ul style="list-style-type: none"> <li>(a) will be capable of providing energy to or reducing consumption from the <b>interconnected electric system</b>;</li> <li>(b) has a <b>uniform capacity value</b> greater than or equal to 1 MW;</li> <li>(c) will be: <ul style="list-style-type: none"> <li>(i) developed in accordance with a project plan and timeline that aligns with the critical milestones established by the <b>ISO</b>; and</li> <li>(ii) energized and commissioned prior to the <b>obligation period</b>.</li> </ul> </li> <li>(d) is not a <b>source asset</b> that is the subject of a renewable electricity support agreement in connection with rounds 1, 2 or 3 of the Renewable Electricity Program;</li> <li>(e) is not energy efficiency;</li> <li>(f) in the case of a load asset: <ul style="list-style-type: none"> <li>(i) can or will be able to reduce demand during the <b>obligation period</b> in a way that is measureable by the <b>ISO</b>; and</li> <li>(ii) is or will be a retail or self-retail asset;</li> </ul> </li> <li>(g) in the case of an <b>energy storage facility</b>, is or will be capable of maintaining energy production at its <b>uniform capacity value</b> for a minimum of 4 hours;</li> <li>(h) in the case of an import asset: <ul style="list-style-type: none"> <li>(i) has firm transmission from the import asset to the Alberta border for the duration of the <b>obligation period</b>;</li> <li>(ii) is not participating as non-recallable capacity in a resource adequacy program of another jurisdiction; and</li> </ul> </li> </ul>	

Section	Subsection	Proposed language	Stakeholder comments
		<p>(iii) will be curtailed on a pro-rata basis by the <b>balancing authority</b> of the jurisdiction in which the import asset is located in when load, which is firm, is curtailed.</p>	
		<p>(i) in the case of an aggregation of assets:</p> <ul style="list-style-type: none"> <li>(i) has a <b>uniform capacity value</b> less than or equal to the <b>maximum capability</b> of the largest generating unit in Alberta multiplied by 0.85;</li> <li>(ii) has or will have the appropriate metering the <b>ISO</b> specifies for each asset in the aggregation;</li> <li>(iii) is comprised of assets that are either exclusively: <ul style="list-style-type: none"> <li>(A) <b>generating units</b> or <b>aggregated generating facilities</b> located within Alberta;</li> <li>(B) load assets providing a <b>firm consumption level</b> located within Alberta; or</li> <li>(C) load assets providing a <b>guaranteed load reduction</b> located within Alberta;</li> </ul> </li> </ul> <p>and,</p> <ul style="list-style-type: none"> <li>(iv) is not comprised of any asset that will contribute capacity individually, or as part of another aggregation, to the capacity market;</li> </ul>	
		<ul style="list-style-type: none"> <li>(j) in the case of incremental capacity, will be retrofitted in a manner that will, in the opinion of the <b>ISO</b>, increase the <b>maximum capability</b> of the asset by an amount in MW that is: <ul style="list-style-type: none"> <li>(i) greater than or equal to 1 MW; and</li> <li>(ii) less than or equal to the greater of: <ul style="list-style-type: none"> <li>(A) 15% of the asset's <b>maximum capability</b>; or</li> </ul> </li> </ul> </li> </ul>	

Section	Subsection	Proposed language	Stakeholder comments
		<p>(B) 40 MW above the asset's <b>maximum capability</b>.</p> <p>(k) in the case of refurbished capacity, will be retrofitted in a manner that will, in the opinion of the <b>ISO</b>, result in either:</p> <p>(i) an increase in the asset's <b>maximum capability</b> by an amount exceeding the greater of:</p> <p>(A) 15% of the asset's <b>maximum capability</b>; or</p> <p>(B) 40 MW above the asset's <b>maximum capability</b>; or</p> <p>(ii) a capital investment of greater than or equal to \$200 per kW of the asset's current <b>maximum capability</b> multiplied by a capital cost escalation rate that is specified by the <b>ISO</b>.</p>	

**Please provide your comments on the following (as set out in AUC Rule 017 s. 13(b-j)):**

Item #		Stakeholder comments
1	whether you agree that amended ISO rule – <i>Section 206.1, Qualification of Capacity</i> relates to the capacity market and why or why not	
2	whether you agree that amended ISO rule – <i>Section 206.1, Qualification of Capacity</i> should [or should not] be in effect for a fixed term and why or why not	
3	whether you understand and agree with the objective or purpose of amended ISO rule – <i>Section 206.1, Qualification of Capacity</i> and whether, in your view, <i>Section 206.1, Qualification of Capacity</i> meets the objective or purpose	
4	how, in your view, amended ISO rule – <i>Section 206.1, Qualification of Capacity</i> affects the performance of the capacity market and the electricity market	
5	your views on any analysis conducted or commissioned by the AESO supporting amended ISO rule – <i>Section 206.1, Qualification of Capacity</i>	
6	whether you agree with amended ISO rule – <i>Section 206.1, Qualification of Capacity</i> taken together with all ISO rules and in light of the principle of a fair, efficient and openly competitive market	
7	whether you would suggest any alternatives to amended ISO rule – <i>Section 206.1, Qualification of Capacity</i>	

Item #		Stakeholder comments
8	whether you agree that the proposed provisional rule supports ensuring a reliable supply of electricity at a reasonable cost to customers and why or why not	
9	whether you agree that the proposed provisional rule supports the public interest and why or why not	

***Please provide your views on the type of content that should be included in an information document associated with amended ISO rule – Section 206.1, Qualification of Capacity.***

Empty response box for stakeholder comments.

Proposed Amended ISO rule – Section 206.2, Self-Supply

<b>Period of Comment:</b>	September 7, 2018	through	September 28, 2018	<b>Contact:</b>	Mark Thompson
<b>Comments From:</b>	TransCanada Energy Ltd. (TCE)			<b>Phone:</b>	403-920-5005
<b>Date [yyyy/mm/dd]:</b>	2018-09-28			<b>Email:</b>	markj_thompson@transcanada.com

*Please provide comments relating to the subsection of the proposed amendments to the rule in the corresponding box. Please include any views on whether the language clearly articulates the requirement for either the AESO or a market participant, and provide any proposed alternative wording by blacklining the proposed language below.*

Section	Subsection	Proposed language	Stakeholder comments
		<b>Applicability</b>	
1		Section 206.2 applies to: <ul style="list-style-type: none"> <li>(a) the <b>legal owner</b> of a load asset that is served by one or more onsite <b>generating units</b> or <b>aggregated generating facilities</b>, excluding sites where the load is exclusively station service for the <b>generating unit</b> or <b>aggregated generating facility</b>;</li> <li>(b) the <b>legal owner</b> of a <b>generating unit</b> or an <b>aggregated generating facility</b> that self-supplies capacity for one or more onsite load assets;</li> <li>(c) the City of Medicine Hat; and</li> <li>(d) the <b>ISO</b>.</li> </ul>	
		<b>Requirements</b> <b>Requirements to Self-supply Capacity</b>	
2	(1)	The <b>legal owner</b> of a load asset must self-supply <b>capacity</b> if such site is: <ul style="list-style-type: none"> <li>(a) metered in a manner that the metering measures both onsite generation and load as a single value for each metering interval; or</li> </ul>	



Section	Subsection	Proposed language	Stakeholder comments
		(b) is not capable of flowing all energy produced on the site on to the <b>interconnected electric system</b> .	
2	(2)	The City of Medicine Hat must self-supply <b>capacity</b> .	
		<b>Application to Self-supply Capacity</b>	
3		The <b>legal owner</b> of a load asset and the City of Medicine Hat must provide the <b>ISO</b> , within the timelines prescribed by the <i>Capacity Market Auction Guidelines</i> , a completed application to self-supply <b>capacity</b> including all information or documents that the <b>ISO</b> specifies.	The timelines should not be noted in guidelines, but rather should be included directly in this rule. This provides investor certainty as the timelines cannot then be easily changed by the AESO.
		<b>Approval to Self-supply Capacity</b>	
4		The <b>ISO</b> must, within the timelines prescribed by the <i>Capacity Market Auction Guidelines</i> , approve an application to self-supply <b>capacity</b> if the site meets the criteria set out in subsection 2.	
		<b>Changes in Self-supply Configuration</b>	
5		The <b>legal owner</b> of a load asset that is self-supplying <b>capacity</b> pursuant to subsection 2(1) must self-supply <b>capacity</b> for a minimum of 4 <b>obligation periods</b> unless it can demonstrate to the <b>ISO</b> 's satisfaction that physical changes to the site warrant a change in self-supply configuration.	<p>TCE does not support the proposed language that a self-supply status designation must remain in effect for at least 4 years. This 4-year designation commitment, combined with the 3-year forward period and a 1-year obligation period, effectively creates an 8-year status commitment that significantly restricts the flexibility of Alberta businesses.</p> <p>TCE acknowledges that sites should declare their intention to self-supply in advance of an auction and that they must meet their capacity market obligations during the delivery period. TCE submits that this provides adequate market certainty. Although it is expected to be rare for self-suppliers to exercise the option to switch status, self-suppliers should maintain the flexibility to switch if needed in response to changes in their business, changes in law, or changes in market rules. These events will not neatly align on a four-year cycle, nor are they necessarily tied to a physical change to the operation of the site. Restrictions should not be unnecessarily imposed that restrict the flexibility of Alberta businesses. On this basis, TCE submits that subsection 5 should be removed.</p> <p>If the AESO decides not to remove the proposed self-supply status designation limitations, TCE submits that the available exclusions to this limitation need to be</p>

Section	Subsection	Proposed language	Stakeholder comments
			<p>expanded beyond physical changes to the operation of the site. It is important to recognize that not all self-supply sites are structured the same way. In some cases, the legal owners of the load asset and the generating units are separate entities in which case the self-supply site is structured via contractual arrangements that pre-date the capacity market and may change over time. The rules must be sufficiently flexible to account for such structural differences. As such, there is a legitimate need for the ability to change a self-supply designation due to business or contractual changes.</p>

**Please provide your comments on the following (as set out in AUC Rule 017 s. 13(b-j)):**

Item #		Stakeholder comments
1	whether you agree that amended ISO rule – <i>Section 206.2, Self-Supply</i> relates to the capacity market and why or why not	
2	whether you agree that amended ISO rule – <i>Section 206.2, Self-Supply</i> should [or should not] be in effect for a fixed term and why or why not	
3	whether you understand and agree with the objective or purpose of amended ISO rule – <i>Section 206.2, Self-Supply</i> and whether, in your view, <i>Section 206.2, Self-Supply</i> meets the objective or purpose	
4	how, in your view, amended ISO rule – <i>Section 206.2, Self-Supply</i> affects the performance of the capacity market and the electricity market	
5	your views on any analysis conducted or commissioned by the AESO supporting amended ISO rule – <i>Section 206.2, Self-Supply</i>	
6	whether you agree with amended ISO rule – <i>Section 206.2, Self-Supply</i> taken together with all ISO rules and in light of the principle of a fair, efficient and openly competitive market	
7	whether you would suggest any alternatives to amended ISO rule – <i>Section 206.2, Self-Supply</i>	

Item #		Stakeholder comments
8	whether you agree that the proposed provisional rule supports ensuring a reliable supply of electricity at a reasonable cost to customers and why or why not	
9	whether you agree that the proposed provisional rule supports the public interest and why or why not	

*Please provide your views on the type of content that should be included in an information document associated with amended ISO rule – Section 206.2, Self-Supply.*

Empty response box for stakeholder comments.

Proposed New ISO rule – Section 206.3, *Uniform Capacity Value Determination*

<b>Period of Comment:</b>	September 7, 2018	through	September 28, 2018	<b>Contact:</b>	Mark Thompson
<b>Comments From:</b>	TransCanada Energy Ltd. (TCE)			<b>Phone:</b>	403-920-5005
<b>Date [yyyy/mm/dd]:</b>	2018-09-28			<b>Email:</b>	markj_thompson@transcanada.com

***Please provide comments relating to the subsection of the proposed rule in the corresponding box. Please include any views on whether the language clearly articulates the requirement for either the AESO or a market participant, and provide any proposed alternative wording by blacklining the proposed language below.***

Section	Subsection	Proposed language	Stakeholder comments
		<b>Applicability</b>	
1		Section 206.3 applies to: (a) a <b>capacity market participant</b> ; and (b) the <b>ISO</b> .	
		<b>Requirements</b> <b>1250 Tightest Supply Cushion Hours</b>	
2		The <b>ISO</b> must select 250 hours from each 12 <b>month</b> consecutive period in the historical 60 <b>month</b> evaluation period as follows: (a) calculate the supply cushion for every hour; (b) rank all hours based on supply cushion in ascending order; (c) within the order referred to in subsection 2(b), rank hours with equivalent supply cushion in ascending order from the most recent to the most distant of time; and (d) select the first 250 hours after ranking in accordance with subsection 2(b) and 2(c).	

Section	Subsection	Proposed language	Stakeholder comments
		<p><b>Asset Specific Hours for Uniform Capacity Value Calculation</b></p>	
3	(1)	<p>The <b>ISO</b> must remove the following hours from the 1250 hours identified in subsection 2 on an asset-specific basis, in order to create an historical data set for each asset listed for a <b>capacity market participant</b> on the list:</p> <ul style="list-style-type: none"> <li>(a) hours in which there was a state of markets suspension;</li> <li>(b) hours that the <b>ISO</b> determines that the asset was affected by: <ul style="list-style-type: none"> <li>(i) an event of limited markets operations, war, invasion, armed conflict, blockade, act of public enemy, riot, revolution, insurrection, act of terrorism, sabotage, act of vandalism, fire that does not originate at the asset, lightning, explosion, earthquake or flooding; and</li> <li>(ii) a <b>mothball outage</b> or temporary economic <b>delist outage</b>;</li> </ul> </li> <li>(c) hours in which the asset had no production or consumption history;</li> <li>(d) hours in which the asset was <b>commissioning</b>; and</li> <li>(e) in the case of an import asset, hours in which the relevant transfer path was unavailable as a result of an issue on the Alberta transmission system.</li> </ul>	<p>TCE submits that part (b)(ii) must be amended to also include physical delist outages. If an asset is delisted, be it for physical or economic reasons, then the hours during the delisted period should not count towards the asset's uniform capacity value in the future.</p>
3	(2)	<p>The <b>ISO</b> may, in the case of a <b>long lead time asset</b> that was synchronized but had varying start-up times for distinct portions of its MW and which required more than 1 hour to deliver such additional portions of its MW, remove the hours where the <b>ISO</b> determines that:</p> <ul style="list-style-type: none"> <li>(a) the <b>pool participant</b> reason in the Energy Trading System indicates that the asset was offline for a long lead time configuration; or</li> <li>(b) the cost assessment for the asset exceeds the <b>pool price</b>;</li> </ul> <p>in order to create an historical data set for each <b>long lead time asset</b> listed for a <b>capacity market participant</b> on the list.</p>	

Section	Subsection	Proposed language	Stakeholder comments
3	(3)	The <b>ISO</b> must, if it determines that the asset was impacted by a <b>transmission market constraint</b> during an hour in the asset's historical data set, add the volume that was curtailed to the <b>metered volume</b> in that hour for the purposes of calculating the <b>uniform capacity value</b> for the asset in accordance with subsection 5(2).	
		<b>Selection of Methodologies for Uniform Capacity Value Calculation</b>	
4		<p>The <b>ISO</b> must, when calculating a <b>uniform capacity value</b> for an asset, apply the methodologies as follows:</p> <ul style="list-style-type: none"> <li>(a) if the number of hours in the historical data set determined in accordance with subsection 3 is greater than or equal to 300 hours and less than or equal to 1250 hours then the methodologies in subsection 5 will be applied to the hours in the historical data set;</li> <li>(b) if the number of hours in the historical data set determined in accordance with subsection 3 is greater than or equal 1 hour and less than 300 hours then: <ul style="list-style-type: none"> <li>(i) the methodologies in subsection 5 will be applied to the hours in the historical data set, as applicable; and</li> <li>(ii) the methodology in subsection 6 will be applied to the number of hours that is 300 hours minus the hours in the historical data set, determined in accordance with subsection 3;</li> </ul> </li> </ul> <p>or</p> <ul style="list-style-type: none"> <li>(c) if the number of hours in the historical data set determined in accordance with subsection 3 is 0 hours then the methodology in subsection 6 will be applied to 300 hours.</li> </ul>	
		<b>Methodologies for Hours in the Historical Data Set</b>	
5	(1)	<p>The <b>ISO</b> must, subject to subsections 5(2) through 5(8) calculate a <b>uniform capacity value</b> for an asset as follows:</p> <ul style="list-style-type: none"> <li>(a) calculate the hourly availability factor using the time weighted <b>available capability</b> as observed in the Energy Trading System, divided by <b>maximum capability</b></li> </ul>	



Section	Subsection	Proposed language	Stakeholder comments
		<p>observed in each hour in the historical data set;</p> <p>(b) calculate the availability factor by averaging the hourly availability factors as calculated in subsection 5(1)(a) over the number of hours in the historical data set; and</p> <p>(c) multiply the availability factor calculated in subsection 5(1)(b) by the asset's <b>maximum capability</b>.</p>	
5	(2)	<p>The ISO must calculate a <b>uniform capacity value</b> for a wind or solar <b>aggregated generating facility</b> or a run of river hydroelectric <b>generating unit</b> or <b>aggregated generating facility</b>, or an aggregated asset containing a wind or solar <b>aggregated generating facility</b> or a run of river hydroelectric <b>generating unit</b> or <b>aggregated generating facility</b>, or assets that do not receive a dispatch as follows:</p> <p>(a) calculate the hourly capacity factor by adding <b>metered energy</b> and applicable <b>ancillary services</b> volumes observed in each hour in the historical data set, and dividing by <b>maximum capability</b>;</p> <p>(b) calculate the capacity factor by averaging each hourly capacity factor in subsection 5(2)(a) over the number of hours in the historical data set; and</p> <p>(c) multiply the capacity factor calculated in subsection 5(2)(b) by the asset's <b>maximum capability</b>.</p>	
5	(3)	<p>The ISO must calculate a <b>uniform capacity value</b> for an import asset as follows:</p> <p>(a) calculate the lesser of an asset's <b>available capability</b> or an asset's firm transmission over a transfer path observed in each hour in the historical data set, and dividing by an asset's firm transmission capacity over a transfer path;</p> <p>(b) calculate the availability factor by averaging each hourly availability factor in subsection 5(3)(a) over the number of hours in the historical data set; and</p> <p>(c) multiply the availability factor calculated in subsection 5(3)(b) by an asset's firm transmission capacity over a transfer path.</p>	

Section	Subsection	Proposed language	Stakeholder comments
5	(4)	<p>The <b>ISO</b> must calculate a <b>uniform capacity value</b> for a site with one or more onsite <b>generating units</b> or <b>aggregated generating facilities</b> that self-supplies <b>capacity</b> and is dispatched gross-to-grid as follows:</p> <ul style="list-style-type: none"> <li>(a) calculate a gross <b>uniform capacity value</b> using the availability factor of the asset on the self-supply site as observed in each of the hours in the historical data set; and</li> <li>(b) translate the gross <b>uniform capacity value</b> calculated in subsection 5(4)(a) to a net <b>uniform capacity value</b> using a linear regression of net-to-grid energy relative to the energy market <b>dispatches</b> issued to the asset on the self-supply site.</li> </ul>	<p>The regression analysis to approximate an availability factor for self-supply assets is an improvement to the previous approach, but creates the potential of a disconnect between actual performance and deemed performance in a given hour. In effect, in many hours the regression will give a materially different result than the actual performance. This creates a ‘sampling’ risk that the availability assessment will be based on deemed performance that is not reflective of actual performance. It is unclear what benefit the regression provides relative to a real-time measure that assesses availability as metered volumes plus ancillary services volumes plus non-dispatched MW, as is used for other thermal assets in the availability factor approach.</p> <p>Notwithstanding a strong preference for the approach noted above, the methodology as described also does not reflect ancillary services volumes appropriately. AS volumes should be included as an independent variable akin to metered volumes and measured against gross availability. The current approach strongly biases net to grid sites against selling ancillary services relative to energy. This is an inefficient incentive and should be corrected by including AS volumes within the independent variable.</p>
5	(5)	<p>The <b>ISO</b> must, subject to subsection 7, calculate a <b>uniform capacity value</b> for a load asset providing <b>firm consumption level</b> as follows:</p> <ul style="list-style-type: none"> <li>(a) identify the <b>metered energy</b> for the <b>settlement intervals</b> with the same <b>hour ending</b> as the hour the historical data set in the following <b>days</b>: <ul style="list-style-type: none"> <li>(i) the 15 most recent <b>business days</b> prior to the <b>day</b> with the hour in the historical data set if the hour falls on a <b>business day</b>;</li> <li>(ii) the 10 most recent weekend <b>days</b> or holidays prior to the <b>day</b> with the hour in the historical data set if the hour falls on a weekend <b>day</b> or a holiday; or</li> <li>(iii) the <b>days</b> the <b>ISO</b> specifies if, in the 45 <b>day</b> period prior to the <b>day</b> with the hour in the historical data set, there are fewer than 15 <b>business days</b> and 10 weekend <b>days</b> when <b>days</b> containing <b>settlement intervals</b> identified in subsection 5(5)(b) are excluded;</li> </ul> </li> <li>(b) determine if any <b>settlement intervals</b> referred to in subsection 5(a) contain any of hours in the historical data set in accordance with subsection 2;</li> </ul>	

Section	Subsection	Proposed language	Stakeholder comments
		(c) calculate the qualified baseline as the average of the <b>metered energy</b> for the <b>settlement intervals</b> referred to in subsection 5(5)(a) excluding the <b>metered energy</b> for the <b>settlement intervals</b> identified in subsection 5(5)(b); and  (d) minus an asset's declared <b>firm consumption level</b> from the qualified baseline calculated in subsection 5(5)(b).	
5	(6)	The <b>ISO</b> must calculate a <b>uniform capacity value</b> for a load asset providing <b>guaranteed load reduction</b> as the <b>guaranteed load reduction</b> declared in accordance with Section 206.1, <i>Qualification of Capacity</i> .	
5	(7)	The <b>ISO</b> must calculate a <b>uniform capacity value</b> for an asset with incremental capacity by  multiplying the performance factor calculated in accordance with subsections 5(1) through 5(6), as applicable, by the sum of the assets <b>maximum capability</b> and the amount of incremental capacity.	
5	(8)	The <b>ISO</b> must calculate a <b>uniform capacity value</b> for an asset that undergoes a derate in its <b>maximum capability</b> in accordance with subsection 5, as applicable, substituting the <b>maximum capability</b> of the asset for its derated <b>maximum capability</b> .	
5	(9)	Where the <b>uniform capacity value</b> for at least 1 asset in an aggregated asset would otherwise be calculated in accordance with subsection 5(2), the <b>ISO</b> must calculate the <b>uniform capacity value</b> of all assets in the aggregated asset in accordance with subsection 5(2).	
		<b>Methodologies for Hours not in the Historical Data Set</b>	
6	(1)	The <b>ISO</b> must calculate a <b>uniform capacity value</b> for an asset in accordance with subsection 4, as follows:  (a) using a class average performance factor multiplied by <b>maximum capability</b> , where the class average performance factor is:  (i) for a load asset, 91% unless the <b>ISO</b> specifies a class average	

Section	Subsection	Proposed language	Stakeholder comments
		<p>performance factor based on Alberta load data; or</p> <p>(ii) for all other assets, as specified by the <b>ISO</b>;</p> <p>(b) if a class average performance factor is not available, using a performance factor based on engineering studies or equivalent engineering documents, or production or load estimates of the asset multiplied by <b>maximum capability</b>; or</p> <p>(c) if a class average performance factor and production or load estimates are not available, using a performance factor based on a review of similar assets in other jurisdictions multiplied by <b>maximum capability</b>.</p>	
6	(2)	<p>The <b>ISO</b> must calculate a <b>uniform capacity value</b> for an import asset where the hours in the historical data set are less than 250 as follows:</p> <p>(a) using the value declared, in accordance with Section 206.1, <i>Qualification of Capacity</i>, for the import asset; and</p> <p>(b) derating the value declared, in accordance with Section 206.1, <i>Qualification of Capacity</i>, to reflect the hours in the 1250 hours determined in accordance with subsection 2 where the British Columbia transfer path, Montana transfer path or Saskatchewan transfer path, as applicable, was out of service with an <b>available transfer capability</b> of 0 MW.</p>	
		<p><b>Test Requirement for Load Asset Providing a Firm Load Consumption</b></p>	
7	(1)	<p>A <b>capacity market participant</b> must, if there were no delivery hours in the <b>obligation period</b> prior to <b>obligation period</b> that the <b>ISO</b> is calculating a <b>uniform capacity value</b> for in accordance with subsection 6(5), demonstrate to the <b>ISO</b> the ability of a load asset providing a <b>firm consumption level</b> to reduce down to the <b>firm consumption level</b> declared by the <b>capacity market participant</b> and maintain the reduction for 1 hour.</p>	
7	(2)	<p>The <b>ISO</b> must, in the event that the load asset providing a <b>firm consumption level</b> fails the demonstration in subsection 7(1), adjust the <b>uniform capacity value</b> calculated in accordance with subsection 6(5) to reflect the observed load reduction.</p>	
		<p><b>Calculation of Ranges for a Uniform Capacity Value</b></p>	

Section	Subsection	Proposed language	Stakeholder comments
8	(1)	<p>The <b>ISO</b> must, subject to subsection 8(2), calculate 3 ranges for a <b>uniform capacity value</b> on an asset-specific basis as follows:</p> <p>(a) the 5% range, as follows:</p> <ul style="list-style-type: none"> <li>(i) calculate the upper limit, as follows: <ul style="list-style-type: none"> <li>(A) remove 5% of the hours identified in the historical data set, in which the asset’s availability factor or capacity factor, as applicable, was the lowest;</li> <li>(B) average the asset’s remaining availability factor or capacity factor, as applicable; and</li> <li>(C) multiply the average remaining availability factor or capacity factor, as applicable, by the asset’s <b>maximum capability</b>; and</li> </ul> </li> <li>(ii) calculate the lower limit, as follows: <ul style="list-style-type: none"> <li>(A) remove 5% of the hours identified in the historical data set, in which the asset’s availability factor or capacity factor, as applicable, was the highest;</li> <li>(B) average the asset’s remaining availability factor or capacity factor, as applicable; and</li> <li>(C) multiply the average remaining availability factor or capacity factor, as applicable, by the asset’s <b>maximum capability</b>;</li> </ul> </li> </ul> <p>(b) the +/- 2% range, as follows:</p> <ul style="list-style-type: none"> <li>(i) calculate the upper limit, as follows: <ul style="list-style-type: none"> <li>(A) 2% multiplied by the <b>maximum capability</b>;</li> <li>(B) added to the <b>uniform capacity value</b>; and</li> </ul> </li> <li>(ii) calculate the lower limit, as follows: <ul style="list-style-type: none"> <li>(A) 2% multiplied by the <b>maximum capability</b>;</li> <li>(B) subtracted from the <b>uniform capacity value</b>; and</li> </ul> </li> </ul>	

Section	Subsection	Proposed language	Stakeholder comments
		(c) the +/- 1 MW range, as follows: <ul style="list-style-type: none"> <li>(i) calculate the upper limit by adding 1 MW to the <b>uniform capacity value</b>; and</li> <li>(ii) calculate the lower limit by subtracting 1 MW to the <b>uniform capacity value</b>.</li> </ul>	
8	(2)	The <b>ISO</b> must not calculate the <b>uniform capacity value</b> ranges in subsection 7(1) for: <ul style="list-style-type: none"> <li>(a) assets with <b>new capacity</b> or refurbished capacity;</li> <li>(b) incremental capacity;</li> <li>(c) a load asset; and</li> <li>(d) an import asset.</li> </ul>	
		<b>Notification of Tightest Supply Cushion Hours and Preliminary Uniform Capacity Values</b>	
9	(1)	The <b>ISO</b> must publish on the AESO website: <ul style="list-style-type: none"> <li>(a) the 1250 tightest supply cushion hours identified in accordance with subsection 2; and</li> <li>(b) the class averages referred to in subsection 6(a).</li> </ul>	
9	(2)	The <b>ISO</b> must provide the following information to a <b>capacity market participant</b> on an asset-specific basis: <ul style="list-style-type: none"> <li>(a) the hours in the historical data set, referred to in subsection 3;</li> <li>(b) the <b>uniform capacity value</b> calculated in accordance with subsections 4, 5 and 6, as applicable;</li> <li>(c) the methodology used to calculate the <b>uniform capacity value</b>;</li> <li>(d) the greatest of the upper limits calculated in accordance with subsections 8(1)(a)(i), 8(1)(b)(i) and 8(1)(c)(i) to a maximum of the asset's <b>maximum</b></li> </ul>	

Section	Subsection	Proposed language	Stakeholder comments
		<p><b>capability</b>; and</p> <p>the lowest of the lower limits calculated in accordance with subsection 8(1)(a)(ii), 8(1)(b)(ii) and 8(1)(c)(ii) to a minimum of 1 MW.</p>	
		<p><b>Uniform Capacity Value Variances</b></p>	
10	(1)	<p>A <b>capacity market participant</b> may, within the timelines prescribed by the <i>Capacity Market Auction</i> Guidelines and in the manner specified by the <b>ISO</b>, submit to the <b>ISO</b>:</p> <ul style="list-style-type: none"> <li>(a) a request to vary the <b>uniform capacity value</b> of an asset for a reason set out in subsection 10(2); and</li> <li>(b) detailed information in support of the request, including, as applicable: <ul style="list-style-type: none"> <li>(i) metering or Energy Trading System data;</li> <li>(ii) information regarding a planned or completed physical change to the asset demonstrating that the <b>maximum capability</b> will increase or decrease by at least 1 MW;</li> <li>(iii) the characteristics, selection criteria and rationale for comparable assets, for class average and jurisdictional assessment requests, including: <ul style="list-style-type: none"> <li>(A) <b>maximum capability</b>; and</li> <li>(B) available production and load data, and</li> </ul> </li> <li>(iv) engineering studies or equivalent engineering documents, or production or load estimates which are specific to the asset at its location, completed by a qualified professional engineer.</li> </ul> </li> </ul>	
10	(2)	<p>The <b>ISO</b> may accept a request made in accordance with subsection 10(1) on the following:</p> <ul style="list-style-type: none"> <li>(a) the metering or Energy Trading System data during the historical data set evaluated by the <b>ISO</b> did not accurately reflect the <b>available capability</b> of the asset;</li> <li>(b) the asset has or will undergo a physical change before the start of the <b>obligation period</b> that will increase or decrease the <b>maximum capability</b> of</li> </ul>	

Section	Subsection	Proposed language	Stakeholder comments
		<p>the asset by at least 1 MW; or</p> <p>(c) where the class average data, production or load estimates, or jurisdictional assessment used in calculating the <b>uniform capacity value</b>, in accordance with subsections 6(1)(a)(ii), 6(1)(b) or 6(1)(c), does not create a comparable representation of the asset's future performance.</p>	
10	(3)	The <b>ISO</b> must notify the <b>capacity market participant</b> of its decision.	
		<b>Declaration and Assignment of Final Uniform Capacity Value</b>	
11	(1)	A <b>capacity market participant</b> must, in accordance with the timelines specified in the <i>Capacity Market Auction Guidelines</i> declare to the <b>ISO</b> , as applicable, the <b>uniform capacity value</b> within the range identified in subsection 8(1) that it will use for the auction.	
11	(2)	The <b>ISO</b> must, in accordance with the timelines specified in the <i>Capacity Market Auction Guidelines</i> , notify the <b>capacity market participant</b> of its assigned <b>uniform capacity value</b> .	



**Please provide your comments on the following (as set out in AUC Rule 017 s. 13(b-j)):**

Item #		Stakeholder comments
1	whether you agree that the proposed new ISO Rule – Section 206.3, <i>Uniform Capacity Value Determination</i> relates to the capacity market and why or why not	
2	whether you agree that the proposed new ISO Rule – Section 206.3, <i>Uniform Capacity Value Determination</i> should [or should not] be in effect for a fixed term and why or why not	
3	whether you understand and agree with the objective or purpose of the proposed new ISO Rule – Section 206.3, <i>Uniform Capacity Value Determination</i> and whether, in your view, the proposed new ISO Rule – Section 206.3, <i>Uniform Capacity Value Determination</i> meets the objective or purpose	
4	how, in your view, the proposed new ISO Rule – Section 206.3, <i>Uniform Capacity Value Determination</i> affects the performance of the capacity market and the electricity market	
5	your views on any analysis conducted or commissioned by the AESO supporting the proposed new ISO Rule – Section 206.3, <i>Uniform Capacity Value Determination</i>	
6	whether you agree with the proposed new ISO Rule – Section 206.3, <i>Uniform Capacity Value Determination</i> taken together with all ISO rules and in light of the principle of a fair, efficient and openly competitive market	

Item #		Stakeholder comments
7	whether you would suggest any alternatives to the proposed new ISO Rule – Section 206.3, <i>Uniform Capacity Value Determination</i>	
8	whether you agree that the proposed provisional rule supports ensuring a reliable supply of electricity at a reasonable cost to customers and why or why not	
9	whether you agree that the proposed provisional rule supports the public interest and why or why not	

***Please provide your views on the type of content that should be included in an information document associated with the proposed new ISO Rule – Section 206.3, Uniform Capacity Value Determination.***

Proposed Amended ISO rule – Section 206.4, Offers and Bids for Capacity

**Period of Comment:** September 7, 2018 through September 28, 2018      **Contact:** Mark Thompson  
**Comments From:** TransCanada Energy Ltd. (TCE)      **Phone:** 403-920-5005  
**Date [yyyy/mm/dd]:** 2018-09-28      **Email:** markj\_thompson@transcanada.com

*Please provide comments relating to the subsection of the proposed amendments to the rule in the corresponding box. Please include any views on whether the language clearly articulates the requirement for either the AESO or a market participant, and provide any proposed alternative wording by blacklining the proposed language below.*

Section	Subsection	Proposed language	Stakeholder comments
		<b>Bid Content</b>	
7	(1)	A <b>capacity market participant</b> with a <b>capacity commitment</b> may submit a <b>bid</b> in a <b>rebalancing auction</b> : <ul style="list-style-type: none"> <li>(a) for a quantity in MW that is equal to or greater than 1 MW and less than or equal to the <b>capacity commitment</b>;</li> <li>(b) that is priced at a price in \$/kW-year to the nearest cent per kW-year which is greater than or equal to \$0/kW-year; and</li> <li>(c) less than or equal to the maximum price established by the final demand curve.</li> </ul>	
7	(2)	A <b>capacity market participant</b> with a <b>capacity commitment</b> must submit a <b>bid</b> , priced at \$0.01/kW-year above the maximum price established by the demand curve, in accordance with the following: <ul style="list-style-type: none"> <li>(a) if the asset's assigned <b>uniform capacity value</b> for the final <b>rebalancing auction</b> is lower than its <b>capacity commitment</b>, the <b>capacity market participant</b> must submit a <b>bid</b> for the difference between the <b>capacity commitment</b> and the assigned <b>uniform capacity value</b>;</li> </ul>	Regarding part (a), TCE submits that there should be a dead band, within which the market participant has the discretion to choose to submit a bid or not. If the uniform capacity value changes by a small amount, the market participant shouldn't be forced to sell out of the difference. This dead band could be the same size as the uniform capacity value range, <i>i.e.</i> 1MW or 2%.

Section	Subsection	Proposed language	Stakeholder comments
		<p>(b) if the <b>ISO</b> determines that the <b>capacity market participant</b> has missed a critical milestone subject to Section 206.5 of the <b>ISO rules</b>, <i>Forward Period Milestone Requirements</i>, the <b>capacity market participant</b> must submit a <b>bid</b> equal to its entire <b>capacity commitment</b> in the applicable <b>rebalancing auction</b>; or</p> <p>(c) if the <b>ISO</b> determines for a load asset that the <b>capacity market participant</b> has not met the milestone set out in Section 206.5 of the <b>ISO rules</b>, <i>Forward Period Milestone Requirements</i>, then that <b>capacity market participant</b> must submit a <b>bid</b> for the difference between the <b>capacity commitment</b> and the assigned <b>uniform capacity value</b> in the final <b>rebalancing auction</b>.</p>	

*Please provide your comments on this rule's appendices:*

Empty rectangular box for comments.

**Please provide your comments on the following (as set out in AUC Rule 017 s. 13(b-j)):**

Item #		Stakeholder comments
1	whether you agree that amended ISO rule – <i>Section 206.4, Offers and Bids for Capacity</i> relates to the capacity market and why or why not	
2	whether you agree that amended ISO rule – <i>Section 206.4, Offers and Bids for Capacity</i> should [or should not] be in effect for a fixed term and why or why not	
3	whether you understand and agree with the objective or purpose of amended ISO rule – <i>Section 206.4, Offers and Bids for Capacity</i> and whether, in your view, <i>Section 206.4, Offers and Bids for Capacity</i> meets the objective or purpose	
4	how, in your view, amended ISO rule – <i>Section 206.4, Offers and Bids for Capacity</i> affects the performance of the capacity market and the electricity market	
5	your views on any analysis conducted or commissioned by the AESO supporting amended ISO rule – <i>Section 206.4, Offers and Bids for Capacity</i>	
6	whether you agree with amended ISO rule – <i>Section 206.4, Offers and Bids for Capacity</i> taken together with all ISO rules and in light of the principle of a fair, efficient and openly competitive market	
7	whether you would suggest any alternatives to amended ISO rule – <i>Section 206.4, Offers and Bids for Capacity</i>	

Item #		Stakeholder comments
8	whether you agree that the proposed provisional rule supports ensuring a reliable supply of electricity at a reasonable cost to customers and why or why not	
9	whether you agree that the proposed provisional rule supports the public interest and why or why not	



***Please provide your views on the type of content that should be included in an information document associated with amended ISO rule – Section 206.4, Offers and Bids for Capacity.***

Empty response box for stakeholder comments.

Proposed New ISO rule – Section 206.5, *Forward Period Milestone Assessment*

<b>Period of Comment:</b>	September 7, 2018	through	September 28, 2018	<b>Contact:</b>	Mark Thompson
<b>Comments From:</b>	TransCanada Energy Ltd. (TCE)			<b>Phone:</b>	403-920-5005
<b>Date [yyyy/mm/dd]:</b>	2018-09-28			<b>Email:</b>	markj_thompson@transcanada.com

***Please provide comments relating to the subsection of the proposed rule in the corresponding box. Please include any views on whether the language clearly articulates the requirement for either the AESO or a market participant, and provide any proposed alternative wording by blacklining the proposed language below.***

Section	Subsection	Proposed language	Stakeholder comments
		<b>Applicability</b>	
1		Section 206.5 applies to: (a) a <b>capacity market participant</b> ; and (b) the <b>ISO</b> .	
		<b>Requirements</b> <b>Milestone Assessment</b>	
2	(1)	The <b>ISO</b> must develop and publish on the AESO website, the critical milestones and associated target completion dates applicable to respective asset classes identified by the <b>ISO</b> .	
2	(2)	The <b>ISO</b> must prior to each <b>rebalancing auction</b> and in accordance with the timelines prescribed in the <i>Capacity Market Auction Guidelines</i> , determine if an asset with <b>new capacity</b> , incremental capacity, or refurbished capacity that is subject to a <b>capacity commitment</b> has achieved the critical milestones prior to the target completion date in advance of the <b>rebalancing auction</b> , as applicable.	The timelines should not be noted in guidelines, but rather should be included directly in this rule. This provides investor certainty as the timelines cannot then be easily changed by the AESO.
2	(3)	The <b>ISO</b> must, where it has determined under subsection 2(2) that an asset with <b>new</b>	

Section	Subsection	Proposed language	Stakeholder comments
		<p><b>capacity</b> has not achieved one or more critical milestones that have target completion dates prior to the date of the applicable <b>rebalancing auction</b>, reasonably determine whether or not such asset will be able to achieve such critical milestone(s):</p> <p>(a) in the case of the first <b>rebalancing auction</b>, within 8 months after the applicable target completion date(s); and</p> <p>(b) in the case of the second <b>rebalancing auction</b>, and in the case of the singular <b>rebalancing auction</b> within the transitional period, within 5 months after the applicable target completion date(s).</p>	
		<p><b>Unique Asset Classes</b></p>	
3	(1)	<p>The <b>ISO</b> may, if it received a project plan for an asset with <b>new capacity</b> pursuant to Section 206.1 of the <b>ISO rules</b>, <i>Qualification of Capacity</i> that is not included in the asset classes set out in subsection 2(1), develop a set of proposed critical milestones and associated target completion dates for such asset.</p>	
3	(2)	<p>The <b>ISO</b> must notify <b>capacity market participants</b> of its proposed critical milestones and associated target completion dates under subsection 3(1).</p>	
3	(3)	<p>The <b>ISO</b> may add an asset class with the critical milestones and target completion dates as determined in subsection 3(1) to the list published in accordance with subsection 2(1).</p>	
3	(4)	<p>The <b>ISO</b> must determine if an asset with <b>new capacity</b> has not achieved one or more critical milestones that have target completion dates prior to the date of the applicable <b>rebalancing auction</b>.</p>	
		<p><b>Outcome of Milestone Assessment</b></p>	
4		<p>A <b>capacity market participant</b> must, where the <b>ISO</b> has determined under subsection 2 that an asset will not achieve one or more critical milestones, submit a <b>bid</b> in respect of the <b>new capacity</b>, incremental capacity, or refurbished capacity of such asset in accordance with Section 206.4 of the <b>ISO rules</b>, <i>Offers and Bids for the Capacity Market</i>.</p>	

Section	Subsection	Proposed language	Stakeholder comments
		<b>Milestone Assessment for Load Assets</b>	
5	(1)	The <b>ISO</b> must, prior to the last <b>rebalancing auction</b> for each load asset with <b>new capacity</b> that is subject to a <b>capacity commitment</b> , make a determination of whether the asset will be able to provide a minimum 75% of the <b>capacity commitment</b> based on the supporting evidence submitted pursuant to subsection 5(2).	
5	(2)	A <b>capacity market participant</b> must submit evidence of sufficient contracted loads to meet the milestone in subsection 5(1) and any other information that the <b>ISO</b> requires.	
5	(3)	The <b>ISO</b> must notify the <b>capacity market participant</b> of its determination under subsection 5(1).	
5	(4)	A <b>capacity market participant</b> must, where the <b>ISO</b> has determined under subsection 5(1) that the asset will not be able to achieve the milestone by the last <b>rebalancing auction</b> , submit a <b>bid</b> in respect of the <b>new capacity</b> of such asset in accordance with Section 206.4 of the <b>ISO rules</b> , <i>Offers and Bids for the Capacity Market</i> .	

**Please provide your comments on the following (as set out in AUC Rule 017 s. 13(b-j)):**

Item #		Stakeholder comments
1	whether you agree that the proposed new ISO Rule – Section 206.5, <i>Forward Period Milestone Assessment</i> relates to the capacity market and why or why not	
2	whether you agree that the proposed new ISO Rule – Section 206.5, <i>Forward Period Milestone Assessment</i> should [or should not] be in effect for a fixed term and why or why not	
3	whether you understand and agree with the objective or purpose of the proposed new ISO Rule – Section 206.5, <i>Forward Period Milestone Assessment</i> and whether, in your view, the proposed new ISO Rule – Section 206.5, <i>Forward Period Milestone Assessment</i> meets the objective or purpose	
4	how, in your view, the proposed new ISO Rule – Section 206.5, <i>Forward Period Milestone Assessment</i> affects the performance of the capacity market and the electricity market	
5	your views on any analysis conducted or commissioned by the AESO supporting the proposed new ISO Rule – Section 206.5, <i>Forward Period Milestone Assessment</i>	
6	whether you agree with the proposed new ISO Rule – Section 206.5, <i>Forward Period Milestone Assessment</i> taken together with all ISO rules and in light of the principle of a fair, efficient and openly competitive market	
7	whether you would suggest any alternatives to the proposed new ISO Rule – Section 206.5, <i>Forward Period Milestone Assessment</i>	

Item #		Stakeholder comments
8	whether you agree that the proposed provisional rule supports ensuring a reliable supply of electricity at a reasonable cost to customers and why or why not	
9	whether you agree that the proposed provisional rule supports the public interest and why or why not	

***Please provide your views on the type of content that should be included in an information document associated with the proposed new ISO Rule – Section 206.5, Forward Period Milestone Assessment.***

Proposed New ISO rule – Section 206.7, *Capacity Market Mitigation*

<b>Period of Comment:</b>	September 7, 2018	through	September 28, 2018	<b>Contact:</b>	Mark Thompson
<b>Comments From:</b>	TransCanada Energy Ltd. (TCE)			<b>Phone:</b>	403-920-5005
<b>Date [yyyy/mm/dd]:</b>	2018-09-28			<b>Email:</b>	markj_thompson@transcanada.com

***Please provide comments relating to the subsection of the proposed rule in the corresponding box. Please include any views on whether the language clearly articulates the requirement for either the AESO or a market participant, and provide any proposed alternative wording by blacklining the proposed language below.***

Section	Subsection	Proposed language	Stakeholder comments
		<b>Applicability</b>	
1		Section 206.7 applies to: (a) a <b>person</b> who has offer control over <b>capacity</b> from an asset that has been assigned a <b>uniform capacity value</b> for a <b>base auction</b> ; and (b) the <b>ISO</b> .	
		<b>Market Power Screen</b>	
2	(1)	The <b>ISO</b> must, before a <b>base auction</b> and within the timelines prescribed by the <i>Capacity Market Auction Guidelines</i> , identify those <b>persons</b> who have market power by conducting the following steps: (a) determine the price corresponding to the inflection point on the final demand curve for the <b>base auction</b> ; (b) determine the slope above the inflection point of the final demand curve for the <b>base auction</b> using the following formula: $m = \frac{y_{cap} - y_{ip}}{x_{min} - x_{ip}}$	



Section	Subsection	Proposed language	Stakeholder comments
		<p>Where</p> <p><math>m</math> means the slope above the inflection point of the final demand curve for the <b>base auction</b>;</p> <p><math>y_{cap}</math> means the price cap;</p> <p><math>x_{min}</math> means the minimum procurement volume;</p> <p><math>y_{ip}</math> means the price corresponding to the inflection point on the final demand curve for the <b>base auction</b>, determined in subsection 2(1)(a); and</p> <p><math>x_{ip}</math> means the capacity volume of the inflection point.</p> <p>(c) determine the slope below the inflection point of the final demand curve for the <b>base auction</b> using the following formula:</p> $n = \frac{y_{ip} - y_{foot}}{x_{ip} - x_{foot}}$ <p>Where</p> <p><math>n</math> means the slope below the inflection point of the final demand curve for the <b>base auction</b>;</p> <p><math>y_{ip}</math> means the price corresponding to the inflection point on the final demand curve for the <b>base auction</b>, determined in subsection 2(1)(a);</p> <p><math>x_{ip}</math> means the capacity volume of the inflection point;</p> <p><math>y_{foot}</math> means the price at the foot of the final demand curve for the <b>base auction</b>; and</p> <p><math>x_{foot}</math> means the volume of capacity at the foot of the final demand curve.</p> <p>(d) calculate the amount of <b>capacity</b> that, if withheld, will raise the clearing price from <math>y_{ip}</math> to 1.1 times <math>y_{ip}</math> using the following formula:</p> $w_1 = 0.1/m \times y_{ip}$ <p>Where:</p> <p><math>w_1</math> means the amount of <b>capacity</b> in MW, if withheld, will raise the clearing price from <math>y_{ip}</math> to 1.1 <math>y_{ip}</math>;</p>	

Section	Subsection	Proposed language	Stakeholder comments
		<p><math>y_{ip}</math> means the price corresponding to the inflection point on the final demand curve for the <b>base auction</b>, determined in subsection 2(1)(a); and</p> <p><math>m</math> means the slope above the inflection point of the final demand curve established for the <b>base auction</b>, calculated in accordance with subsection 2(1)(a)(ii).</p> <p>(e) calculate, the amount of <b>capacity</b> that, if withheld, will raise the clearing price from <math>y_{ip} / 1.1</math> to <math>y_{ip}</math> using the formula:</p> $w_2 = 0.1/1.1n \times y_{ip}$ <p>Where:</p> <p><math>w_2</math> means the amount of <b>capacity</b> in MW, if withheld, will raise the clearing price from <math>y_{ip} / 1.1</math> to <math>y_{ip}</math>;</p> <p><math>y_{ip}</math> means the price corresponding to the inflection point on the final demand curve for the <b>base auction</b>, determined in subsection 2(1)(a); and</p> <p><math>n</math> means the slope below the inflection point of the final demand curve established for the <b>base auction</b>.</p> <p>(f) calculate the average of the <b>capacity</b> referred to in subsections 2(1)(c) and 2(1)(d) using the formula:</p> $w = (w_1 + w_2)/2 = (0.1/2m + 0.1/2.2n) \times y_{ip}$ <p>Where:</p> <p><math>w</math> means the average of the <b>capacity</b> in MW referred to in subsections 2(1)(d) and 2(1)(e) and is the minimum amount of <b>capacity</b> in MW to be withheld above and below the inflection point to effect a 10% change in the clearing price;</p> <p><math>w_1</math> means the value in MW calculated in subsection 2(1)(a);</p> <p><math>w_2</math> means the value in MW calculated in subsection 2(1)(b);</p> <p><math>m</math> means the slope above the inflection point of the final demand curve established for the <b>base auction</b>, calculated in accordance with subsection 2(1)(a)(ii);</p> <p><math>n</math> means the slope of the final demand curve below the inflection point; and</p> <p><math>y_{ip}</math> means the price corresponding to the inflection point on the final demand curve for the</p>	

Section	Subsection	Proposed language	Stakeholder comments
		<p><b>base auction</b>, determined in subsection 2(1)(a);</p> <p>(g) calculate the minimum amount of <b>capacity</b> that a <b>person</b> must have under its offer control to withhold the amount of <b>capacity</b> calculated in subsection 2(1)(f) from the capacity market without sustaining any financial loss, using the following steps:</p> <p>(i) determine the amount of <b>capacity</b> under the offer control of a <b>person</b> that, if the amount calculated in 2(1)(f) is economically withheld from the capacity market, that <b>person</b> would earn revenue from the capacity market that is no less than the amount the <b>person</b> would earn absent of the withholding, using the formula:</p> $1.1 \times p \times (q - w) \geq p \times q$ <p>Where:</p> <p><i>q</i> means the amount of <b>capacity</b>, in MW referred to in subsection 2(1)(g), held by a <b>person</b> and its associates, as associate is described in the <i>Fair, Efficient, and Open Competition Regulation</i>;</p> <p><i>p</i> means the market clearing price absent of the withholding; and</p> <p><i>w</i> means the amount of <b>capacity</b> in MW referred to in subsection 2(1)(f);</p> <p>(ii) determine the minimum amount of <b>capacity</b> referred to in subsection 2(1)(g), using the formula:</p> $q = 11 \times \{(0.1/2m + 0.1/2.2n) \times y_{ip}\}$ <p>Where:</p> <p><i>q</i> means the minimum amount of <b>capacity</b>, in MW referred to in subsection 2(1)(g), held by a <b>person</b> and its associates, as associate is described in the <i>Fair, Efficient, and Open Competition Regulation</i>;</p> <p><i>m</i> means the slope above the inflection point of the final demand curve established for the <b>base auction</b> in subsection 2(1)(b);</p> <p><i>n</i> means the slope of the final demand curve below the inflection point; and</p> <p><i>y<sub>ip</sub></i> means the price corresponding to the inflection point on the final demand curve established for the <b>base auction</b>.</p>	

Section	Subsection	Proposed language	Stakeholder comments
2	(2)	The <b>ISO</b> must identify those <b>persons</b> that have offer control over an amount of <b>capacity</b> that is greater than or equal to the amount of <b>capacity</b> calculated in subsection 2(1)(g), where <b>capacity</b> is measured by <b>uniform capacity values</b> , excluding such <b>capacity</b> that is <b>new capacity</b> or incremental capacity.	
2	(3)	<p>The <b>ISO</b> must, in accordance with the timelines established in the <i>Capacity Market Auction Guidelines</i>:</p> <ul style="list-style-type: none"> <li>(a) publish the minimum amount of <b>capacity</b> identified in subsection 2(1)(g); and</li> <li>(b) notify a <b>person</b> that has been identified in subsection 2(2) as having market power.</li> </ul>	The timelines should not be noted in guidelines, but rather should be included directly in this rule. This provides investor certainty as the timelines cannot then be easily changed by the AESO.
		<b>Offer price cap</b>	
3		<p>Subject to subsection 4, a <b>person</b> that has received a notification in accordance with subsection 2(3)(b) that they have market power must, with respect to an asset under the <b>offer control</b> of such <b>person</b>, except for <b>new capacity</b>, refurbished capacity, or incremental capacity, submit an <b>offer</b> in a <b>base auction</b> at or below an <b>offer</b> price cap as follows:</p> <ul style="list-style-type: none"> <li>(a) where the price cap for the <b>base auction</b> is set at a multiple of net-CONE in accordance with Section 207.3 of the <b>ISO rules</b>, <i>Shape of Demand Curve</i>, the <b>offer</b> price cap is an amount that is 80% of the net-CONE; or</li> <li>(b) where the price cap for the <b>base auction</b> is set at a multiple of gross-CONE in accordance with Section 207.3 of the <b>ISO rules</b>, <i>Shape of Demand Curve</i> the <b>offer</b> price cap is an amount that is 80% of the ratio between the multiple of gross-CONE and the multiple of net-CONE specified in Section 207.3 of the <b>ISO rules</b>, <i>Shape of Demand Curve</i> multiplied by gross-CONE.</li> </ul>	
		<b>Asset-specific offer price cap</b>	
4	(1)	A <b>person</b> that has received a notification in accordance with subsection 2(3)(b) as having market power may submit to the <b>ISO</b> , in the form and manner the <b>ISO</b> specifies, a request for an asset-specific offer price cap to offer <b>capacity</b> from an asset under the <b>offer control</b>	

Section	Subsection	Proposed language	Stakeholder comments
		of such <b>person</b> , except for <b>new capacity</b> , refurbished capacity or incremental capacity, above the <b>offer</b> price cap established in subsection 4.	
4	(2)	<p>A <b>person</b> requesting an asset-specific price cap, in accordance with subsection 4(1), must submit to the <b>ISO</b> the following:</p> <ul style="list-style-type: none"> <li>(a) the asset to which the asset-specific price cap request applies;</li> <li>(b) avoidable costs of the asset for the <b>obligation period</b>;</li> <li>(c) any costs necessary for the <b>ISO</b> to calculate the energy and ancillary services offset in accordance with subsection 4(4)(a); and</li> <li>(d) an attestation from a corporate officer of the <b>legal owner</b> that has <b>offer control</b> over the asset that the information provided pursuant to subsections 4(2)(b) and 4(2)(c) are complete and accurate.</li> </ul>	
4	(3)	The <b>ISO</b> may, with respect to the avoidable costs submitted pursuant to subsection 4(2)(b), exclude costs items that are unreasonable.	
4	(4)	<p>The <b>ISO</b> must, when a request is made for an asset-specific price cap under subsection 4(1)(a):</p> <ul style="list-style-type: none"> <li>(a) calculate the energy and ancillary services offset, as applicable, using the methodology set out in Section 206.11 of the <b>ISO rules, Energy and Ancillary Services Offset for Assets</b> for the asset to which the request for the asset-specific offer price cap applies; and</li> <li>(b) subtract the energy and ancillary services offset referred to in subsection 4(4)(a) from the avoidable costs submitted pursuant to subsection 4(2)(b) that have not been excluded by the <b>ISO</b> pursuant to subsection 4(3).</li> </ul>	
4	(5)	The <b>ISO</b> must, if it determines the amount calculated in subsection 4(4)(b) is greater than the <b>offer</b> price cap referred to in subsection 3, provide an asset-specific price cap equal to the amount determined in subsection 4(4)(b) to the <b>person</b> that submitted the asset-specific price cap request under subsection 4(1)(a).	

Section	Subsection	Proposed language	Stakeholder comments
4	(6)	A <b>person</b> must, if the <b>person</b> has been provided an asset-specific offer price cap in accordance with subsection 4(5), submit an <b>offer</b> in the <b>base auction</b> at a price equal to or below the asset-specific <b>offer</b> price cap for the <b>capacity</b> from an asset referred to in subsection 4(2)(a).	
4	(7)	A <b>person</b> must, if the <b>person</b> does not receive an asset-specific price cap pursuant to subsection 4(5), submit an <b>offer</b> in the <b>base auction</b> at or below the <b>offer</b> price cap established in subsection 3 for the <b>capacity</b> from an asset referred to in subsection 4(2)(a).	

**Please provide your comments on the following (as set out in AUC Rule 017 s. 13(b-j)):**

Item #		Stakeholder comments
1	whether you agree that the proposed new ISO Rule – Section 206.7, <i>Capacity Market Mitigation</i> relates to the capacity market and why or why not	
2	whether you agree that the proposed new ISO Rule – Section 206.7, <i>Capacity Market Mitigation</i> should [or should not] be in effect for a fixed term and why or why not	
3	whether you understand and agree with the objective or purpose of the proposed new ISO Rule – Section 206.7, <i>Capacity Market Mitigation</i> and whether, in your view, the proposed new ISO Rule – Section 206.7, <i>Capacity Market Mitigation</i> meets the objective or purpose	
4	how, in your view, the proposed new ISO Rule – Section 206.7, <i>Capacity Market Mitigation</i> affects the performance of the capacity market and the electricity market	

Item #		Stakeholder comments
5	your views on any analysis conducted or commissioned by the AESO supporting the proposed new ISO Rule – Section 206.7, <i>Capacity Market Mitigation</i>	
6	whether you agree with the proposed new ISO Rule – Section 206.7, <i>Capacity Market Mitigation</i> taken together with all ISO rules and in light of the principle of a fair, efficient and openly competitive market	
7	whether you would suggest any alternatives to the proposed new ISO Rule – Section 206.7, <i>Capacity Market Mitigation</i>	
8	whether you agree that the proposed provisional rule supports ensuring a reliable supply of electricity at a reasonable cost to customers and why or why not	
9	whether you agree that the proposed provisional rule supports the public interest and why or why not	

***Please provide your views on the type of content that should be included in an information document associated with the proposed new ISO Rule – Section 206.7, Capacity Market Mitigation.***



Proposed New ISO rule – 206.8, *Obligation Period Performance Assessments*

<b>Period of Comment:</b>	September 7, 2018	through	September 28, 2018	<b>Contact:</b>	Mark Thompson
<b>Comments From:</b>	TransCanada Energy Ltd. (TCE)			<b>Phone:</b>	403-920-5005
<b>Date [yyyy/mm/dd]:</b>	2018-09-28			<b>Email:</b>	markj_thompson@transcanada.com

***Please provide comments relating to the subsection of the proposed rule in the corresponding box. Please include any views on whether the language clearly articulates the requirement for either the AESO or a market participant, and provide any proposed alternative wording by blacklining the proposed language below.***

Section	Subsection	Proposed language	Stakeholder comments
		<b>Applicability</b>	
1		Section 206.8 applies to: (a) the <b>ISO</b> .	
		<b>Requirements</b> <b>Availability Hours during an Obligation Period</b>	
2	(1)	The <b>ISO</b> must select 250 hours from each <b>obligation period</b> to assess availability as follows: (a) calculate the supply cushion for every hour in an <b>obligation period</b> ; (b) rank all hours based on supply cushion in ascending order; (c) within the order referred to in subsection 2(1)(b), rank hours with equivalent supply cushion in ascending order from the most recent to the most distant of time; and (d) select the first 250 hours after ranking in accordance with subsection 2(1)(b) and 2(1)(c).	
2	(2)	The <b>ISO</b> must, in order to establish the availability hours for an asset, remove the following	TCE submits that the AESO should remove the market suspension hours (all hours that would be removed for all assets) prior to selecting the 250 uniform capacity value hours in

Section	Subsection	Proposed language	Stakeholder comments
		<p>hours from the 250 hours identified in subsection 2(1) on an asset-specific basis:</p> <ul style="list-style-type: none"> <li>(a) hours in which there was a state of markets suspension; and</li> <li>(b) hours that the <b>ISO</b> determines that the asset is affected by an event of limited markets operations, war, invasion, armed conflict, blockade, act of public enemy, riot, revolution, insurrection, act of terrorism, sabotage, act of vandalism, fire that does not originate at the asset, lightning, explosion, earthquake or flooding.</li> </ul>	<p>order to maintain as large a data set as possible for the market.</p>
		<p><b>Delivery Hours for a Settlement Period</b></p>	
3	(1)	<p>The <b>ISO</b> must select hours to assess delivery for a <b>settlement period</b> by identifying any hours or portions thereof in which a supply shortfall has occurred and the <b>ISO</b> has declared an energy emergency event in accordance with Section 305.1 of the <b>ISO rules</b>, <i>Energy Emergency Alerts</i>.</p>	
3	(2)	<p>The <b>ISO</b> must, in order to establish the delivery hours for an asset, remove the following hours from the hours selected in subsection 3(1) on an asset-specific basis:</p> <ul style="list-style-type: none"> <li>(a) hours in which there was a state of markets suspension; and</li> <li>(b) hours that the <b>ISO</b> determines that the asset was affected by an event of limited markets operations, war, invasion, armed conflict, blockade, act of public enemy, riot, revolution, insurrection, act of terrorism, sabotage, act of vandalism, fire that does not originate at the asset, lightning, explosion, earthquake or flooding.</li> </ul>	
		<p><b>Look-back Baseline for a Load Asset Providing a Firm Consumption Level</b></p>	
4		<p>The <b>ISO</b> must, for each of the availability hours established in subsection 2(2), calculate the look-back baseline as a volume in MW for a load asset as follows:</p> <ul style="list-style-type: none"> <li>(a) identify the <b>metered energy</b> for the <b>settlement intervals</b> with the same <b>hour ending</b> as the availability hour in the <b>days</b> which must be either: <ul style="list-style-type: none"> <li>(i) the 15 most recent <b>business days</b> prior to the <b>day</b> with the availability</li> </ul> </li> </ul>	

Section	Subsection	Proposed language	Stakeholder comments
		<p>hour if the availability hour falls on a <b>business day</b>;</p> <ul style="list-style-type: none"> <li>(ii) the 10 most recent weekend <b>days</b> or holidays prior to the <b>day</b> with the availability hour if the availability hour falls on a weekend <b>day</b> or a holiday; or</li> <li>(iii) the <b>days</b> the <b>ISO</b> specifies if, in the 45 <b>day</b> period prior to the <b>day</b> with the availability hour, there are fewer than 15 <b>business days</b> and 10 weekend <b>days</b> when <b>days</b> containing <b>settlement intervals</b> identified in subsection 4(b) are excluded;</li> </ul> <p>(b) determine if any <b>settlement intervals</b> referred to in subsection 4(a) contain:</p> <ul style="list-style-type: none"> <li>(i) any of the availability hours established in subsection 2(2); or</li> <li>(ii) any of the delivery hours established in subsection 3(2); and</li> </ul> <p>(c) calculate the average of the <b>metered energy</b> for the <b>settlement intervals</b> referred to in subsection 4(a) excluding the <b>metered energy</b> for the <b>settlement intervals</b> identified in subsection 4(b).</p>	
		<p><b>Delivery Baseline for a Load Asset Providing Guaranteed Load Reduction</b></p>	
5	(1)	<p>The <b>ISO</b> must, for each of the delivery hours established in subsection 3(2), calculate the standard baseline in MW as follows:</p> <ul style="list-style-type: none"> <li>(a) identify the <b>days</b> for the calculation which must be either: <ul style="list-style-type: none"> <li>(i) the 10 most recent <b>business days</b> prior to the <b>day</b> with the delivery hour if the delivery hour falls on a <b>business day</b>;</li> <li>(ii) the 5 most recent weekend <b>days</b> or holidays prior to the <b>day</b> with the delivery hour if the delivery hour falls on a weekend <b>day</b> or a holiday; or</li> <li>(iii) the <b>days</b> the <b>ISO</b> specifies if, in the 35 <b>day</b> period prior to the <b>day</b> with the delivery hour, there are fewer than 10 <b>business days</b> and 5 weekend <b>days</b> when <b>days</b> identified in subsection 5(1)(b) are excluded or replaced;</li> </ul> </li> <li>(b) exclude or replace any of the <b>days</b> identified in subsection 5(1)(a) if the following occurred:</li> </ul>	

Section	Subsection	Proposed language	Stakeholder comments
		<ul style="list-style-type: none"> <li>(i) the asset received <b>dispatch</b> for an amount greater than 0 MW;</li> <li>(ii) delivery was assessed in accordance with subsection 9(1);</li> <li>(iii) the load asset was subject to a <b>delayed forced outage</b> or <b>automatic forced outage</b>;</li> <li>(iv) the load asset was subject to a <b>planned outage</b>; or</li> <li>(v) the load asset was tripped for the provision of <b>load shed service</b>;</li> <li>(c) for each of the <b>days</b> identified in accordance with subsections 5(1)(a) excluding or replacing the <b>days</b> as indicated in subsection 5(1)(b), identify the <b>metered energy</b> for the <b>settlement interval</b> with the same <b>hour ending</b> as the delivery hour; and</li> <li>(d) calculate the average of the <b>metered energy</b> for the <b>settlement intervals</b> referred to in subsection 5(1)(c).</li> </ul>	
5	(2)	<p>The <b>ISO</b> must, for each delivery hour established in subsection 3(2), calculate an adjustment factor as follows:</p> $\text{adjustment factor} = \text{delivery consumption} \div \text{historical consumption}_{3W}$ <p>where:</p> <ul style="list-style-type: none"> <li>delivery consumption means the average consumption in MWh during the 3 hour window occurring 1 hour before the delivery hour;</li> <li>historical consumption means the average consumption in MWh during all of the 3W hours on the <b>days</b> identified in accordance with subsections 5(1)(a) and excluding or replacing the <b>days</b> as indicated in subsection 5(1)(b); and</li> <li>3W means the 3 hour window occurring 1 hour before the same <b>hour ending</b> as the delivery hour.</li> </ul>	
5	(3)	<p>The <b>ISO</b> must establish the adjustment factor as:</p> <ul style="list-style-type: none"> <li>(a) 1.2 if the adjustment factor calculated in accordance with subsection 5(2) is greater than 1.2;</li> </ul>	

Section	Subsection	Proposed language	Stakeholder comments
		(b) 0.8 if the adjustment factor calculated in accordance with subsection 5(2) is less than 0.8; or (c) the value calculated in accordance with subsection 5(2) in all other cases.	
5	(4)	The <b>ISO</b> must calculate the delivery baseline in MW as follows: $\text{delivery baseline} = \text{standard day baseline} \times \text{adjustment factor}$ where: the standard day baseline in MW is calculated in accordance with subsection 5(1); and the adjustment factor is the value established in accordance with subsection 5(3).	
		<b>Asset-specific Penalty Rate for Availability Assessment</b>	
6	(1)	The <b>ISO</b> must calculate the asset-specific penalty rate in \$/MWh to be applied during the availability assessment, as follows: $\text{asset-specific penalty rate} = \frac{\text{capacity payment} \times 12}{\text{capacity commitment} \times \text{hours}}$ where: capacity payment in \$/month is calculated for the asset in accordance with Section 103.10 of the <b>ISO rules</b> , <i>Capacity Payment Calculation</i> ; <b>capacity commitment</b> is in MW; and hours is the number of availability hours established in accordance with subsection 2(2).	
6	(2)	The <b>ISO</b> must establish the asset-specific penalty rate in \$/MWh as: (a) \$133/MWh, if the rate calculated in accordance with subsection 6(1) is less than \$133/MWh and the clearing price of the <b>base auction</b> was greater than \$33/kW-year;	

Section	Subsection	Proposed language	Stakeholder comments
		<p>(b) \$0/MWh, if the rate calculated in accordance with subsection 6(1) is less than \$0/MWh and the clearing price of the <b>base auction</b> was less than or equal to \$33/kW-year; or</p> <p>(c) the rate calculated in accordance with subsection 6(1) in all other cases.</p>	
		<p><b>Availability Assessment</b></p>	
7	(1)	<p>The <b>ISO</b> must, as soon as practicable after an <b>obligation period</b>, identify the asset's availability volume in MWh during each of the availability hours identified in subsection 2 as follows:</p> <p>(a) for an asset with a <b>uniform capacity value</b> based on a capacity factor, availability volume is based on the sum of the following for each <b>settlement interval</b>, as applicable:</p> <ul style="list-style-type: none"> <li>(i) <b>metered energy</b>;</li> <li>(ii) in the case of an asset that was subject to a <b>dispatch for spinning reserve or supplemental reserve</b>, the volume that was provided according to Section 205.5 of the <b>ISO rules, Spinning Reserve Technical Requirements and Performance Standards</b> or Section 205.6 of the <b>ISO rules, Supplemental Reserve Technical Requirements and Performance Standards</b>;</li> <li>(iii) in the case of an asset that provides <b>regulating reserve</b>, the volume based on the <b>regulating reserve</b> provided pursuant to Section 205.4 of the <b>ISO rules, Regulating Reserve Technical Requirements and Performance Standards</b> that is not captured as <b>metered energy</b>; and</li> <li>(iv) in the case of an asset that was impacted by a <b>transmission market constraint</b>, the volume that was curtailed;</li> </ul> <p>(b) for an asset with a <b>uniform capacity value</b> based on <b>availability factor</b>, availability volume is equal to:</p> <ul style="list-style-type: none"> <li>(i) the <b>available capability</b> submitted into the Energy Trading System where the <b>offer</b> for electric energy was available for <b>dispatch</b> for that <b>settlement</b></li> </ul>	<p>The regression analysis to approximate an availability factor for self-supply assets is an improvement to the previous approach, but creates the potential of a disconnect between actual performance and deemed performance in a given hour. In effect, in many hours the regression will give a materially different result than the actual performance. This creates a 'sampling' risk that the availability assessment will be based on deemed performance that is not reflective of actual performance. It is unclear what benefit the regression provides relative to a real-time measure that assess availability as metered volumes plus ancillary services volumes plus non-dispatched MW, as is used for other thermal assets in the availability factor approach.</p> <p>Notwithstanding a strong preference for the approach noted above, the methodology as described also does not reflect ancillary services volumes appropriately. AS volumes should be included as an independent variable akin to metered volumes and measured against gross availability. The current approach strongly biases net to grid sites against selling ancillary services relative to energy. This is an inefficient incentive and should be corrected by including AS volumes within the independent variable.</p>

Section	Subsection	Proposed language	Stakeholder comments
		<p><b>interval</b>; and</p> <ul style="list-style-type: none"> <li>(ii) if applicable, any <b>operating reserves</b> provided in that <b>settlement interval</b> pursuant to a <b>dispatch</b>; or</li> <li>(ii) 0 MW when there was no electric energy from the asset available for dispatch for that <b>settlement interval</b>;</li> <li>(c) for a load asset that provides a <b>guaranteed load reduction</b>, availability volume is the <b>available capability</b> for that <b>settlement interval</b>;</li> <li>(d) for a load asset that provides a <b>firm consumption level</b>, availability volume is based on the difference between the look-back baseline calculated in accordance with subsection 3 and the <b>firm consumption level</b> for that <b>settlement interval</b>;</li> <li>(e) for self-supply assets that are dispatched gross to grid, availability volume is based on the linear regression approach set out in Section 206.3 of the <b>ISO rules, Determination of Uniform Capacity Value</b>; and</li> <li>(f) for an import asset, availability volume is the <b>available capability</b> for that <b>settlement interval</b> capped at the volume of firm transmission established in accordance with Section 206.1 of the <b>ISO Rules, Qualification of Capacity</b>.</li> </ul>	
7	(2)	<p>The <b>ISO</b> must calculate the assessment volume in MWh for an asset as follows:</p> $assessment\ volume = \sum \text{availability volume} - \text{capacity commitment} \times \text{hours}$ <p>where:</p> <ul style="list-style-type: none"> <li>availability volume in MWh is the value identified for each of the availability hours in accordance with subsection 7(1); and</li> <li>hours is the number of availability hours established in accordance with subsection 2(2).</li> </ul>	
		<p><b>Under-availability Adjustment</b></p>	
8	(1)	<p>The <b>ISO</b> must, when the assessment volume calculated in accordance with subsection 7(2) is negative, calculate the under-availability adjustment in dollars for an asset as</p>	

Section	Subsection	Proposed language	Stakeholder comments
		<p>follows:</p> $\text{under-availability adjustment} = \text{adjustment rate} \times \text{assessment volume}$ <p>where:</p> <p>adjustment rate in \$/MWh is calculated in accordance with subsection 8(2); and  assessment volume in MWh is calculated in accordance with subsection 7(2).</p>	
8	(2)	<p>The ISO must calculate the adjustment rate in \$/MWh, for each asset, as follows:</p> $\text{adjustment rate} = 40\% \times 1.3 \times \text{asset-specific penalty rate}$ <p>where:</p> <p>asset-specific penalty rate in \$/MWh is determined in accordance with subsection 6(2).</p>	<p>TCE submits that the overall penalty and incentive framework sends poor market signals. In the context of the current framework, which is not ideal, more value should be placed on the availability component of the equation. Availability on average is far more within the control of a generator than availability in a very small number of random hours (EEA events). The current framework has the poor incentive of penalizing bad luck very strongly (EEA events) and penalizing systematically poor availability very weakly (availability hours).</p>
8	(3)	<p>The ISO must, for each asset, limit the under-availability adjustment amount for an <b>obligation period</b> to:</p> <ul style="list-style-type: none"> <li>(a) an amount in dollars equal to the annual cap determined in accordance with subsection 14(2) minus the sum of all under-delivery adjustments determined in accordance with subsection 12(3) for the <b>obligation period</b>, if the sum of the under-availability adjustment determined in accordance with subsection 8(1) and under-delivery adjustments for the <b>obligation period</b> is greater than the annual cap; or</li> <li>(b) the amount in dollars calculated in accordance with subsection 8(1), in all other cases.</li> </ul>	
		<p><b>Over-availability Adjustment</b></p>	
9	(1)	<p>The ISO must, when the assessment volume calculated in accordance with subsection 7(2) is positive, calculate the over-availability adjustment in dollars for an asset as follows:</p> $\text{over-availability adjustment} = \text{adjustment rate} \times \text{assessment volume}$	



Section	Subsection	Proposed language	Stakeholder comments
		<p>where:</p> <p>adjustment rate is the value calculated in accordance with subsection 9(2); and</p> <p>assessment volume in MWh is calculated in accordance with subsection 7(2).</p>	
9	(2)	<p>The <b>ISO</b> must calculate the adjustment rate in \$/MWh, which is the same value for all assets, as follows:</p> $adjustment\ rate = \frac{\sum\ under-availability\ adjustments}{\sum\ positive\ assessment\ volumes}$ <p>where:</p> <p>under-availability adjustments in dollars is determined in accordance with 8(3) for all assets subject to a <b>capacity commitment</b> in an <b>obligation period</b>; and</p> <p>positive assessment volumes in MWh is the positive values calculated in accordance with subsection 7(2) for all assets subject to a <b>capacity commitment</b> in an <b>obligation period</b>.</p>	TCE submits that all assets should be eligible for incentive payments, not just those with a capacity commitment.
9	(3)	<p>The <b>ISO</b> must, for each asset, limit the over-availability adjustment amount for an <b>obligation period</b> to an amount in dollars equal to the annual cap determined in accordance with subsection 15 minus the sum of all over-delivery adjustments determined in accordance with subsection 13(3) for the <b>obligation period</b>.</p>	TCE submits that there should not be a cap on incentive payments and, accordingly, that this section is not required.
		<p><b>Asset-specific Penalty Rate for Delivery Assessments</b></p>	
10	(1)	<p>The <b>ISO</b> must calculate the asset-specific penalty rate in \$/MWh for an asset, to be applied during the delivery assessments, as follows:</p> $asset-specific\ penalty\ rate = \frac{capacity\ payment\ x\ 12}{capacity\ commitment\ x\ hours}$ <p>where:</p> <p>capacity payment in \$/month is calculated for the asset in accordance with Section 103.10 of the <b>ISO rules</b>, <i>Capacity Payment Calculation</i>; and</p> <p>hours is the greater of 20 or the forecasted number of energy supply shortfall hours for the <b>obligation period</b> as described in the <i>Capacity Market Auction</i></p>	

Section	Subsection	Proposed language	Stakeholder comments
		<i>Guidelines</i> published for the last <b>rebalancing auction</b> of the <b>obligation period</b> .	
10	(2)	<p>The <b>ISO</b> must establish the asset-specific penalty rate in \$/MWh as:</p> <ul style="list-style-type: none"> <li>(a) \$1,667/MWh, if the rate calculated in accordance with subsection 10(1) is less than \$1,667/MWh and the clearing price of the <b>base auction</b> was greater than \$33/kW-year;</li> <li>(b) \$0/MWh, if the rate calculated in accordance with subsection 10(1) is less than \$0/MWh and the clearing price of the <b>base auction</b> was less than or equal to \$33/kW-year or</li> <li>(b) the rate calculated in accordance with subsection 10(1) in all other cases.</li> </ul>	
		<b>Delivery Assessments</b>	
11	(1)	<p>The <b>ISO</b> must, as soon as practicable in the <b>settlement period</b> following each delivery hour established in subsection 3(2), identify an asset's delivery volume in MWh during each of the delivery hours as follows:</p> <ul style="list-style-type: none"> <li>(a) for an asset with a <b>uniform capacity value</b> based on a <b>capacity factor</b> or <b>availability factor</b>, the delivery volume is based on the sum of the following for each <b>settlement interval</b>, as applicable: <ul style="list-style-type: none"> <li>(i) <b>metered energy</b>;</li> <li>(ii) in the case of an asset that was subject to a <b>dispatch</b> for <b>spinning reserve</b> or <b>supplemental reserve</b>, the volume that was provided according to Section 205.5 of the <b>ISO rules</b>, <i>Spinning Reserve Technical Requirements and Performance Standards</i> or Section 205.6 of the <b>ISO rules</b>, <i>Supplemental Reserve Technical Requirements and Performance Standards</i>; and</li> <li>(iii) in the case of an asset that provided <b>regulating reserve</b>, the volume based on the <b>regulating reserve</b> provided pursuant to Section 205.4 of the <b>ISO rules</b>, <i>Regulating Reserve Technical Requirements and Performance Standards</i> that is not captured as <b>metered energy</b>;</li> </ul> </li> <li>(b) for a load asset that provides a <b>guaranteed load reduction</b>, the delivery</li> </ul>	

Section	Subsection	Proposed language	Stakeholder comments
		<p>volume is equal to the delivery baseline calculated in accordance with subsection 5(4) minus the following for each <b>settlement interval</b>, as applicable:</p> <ul style="list-style-type: none"> <li>(i) <b>metered energy</b>; and</li> <li>(ii) in the case of an asset that provided <b>spinning reserve</b> or <b>supplemental reserve</b>, the volume that was dispatched.</li> </ul> <p>(c) for a load asset that provides a <b>firm consumption level</b>, the delivery volume is equal to the qualified baseline as calculated in accordance with Section 206.3 of the <b>ISO rules</b>, <i>Determination of Uniform Capacity Value</i> minus the following for each <b>settlement interval</b>, as applicable:</p> <ul style="list-style-type: none"> <li>(i) <b>metered energy</b>; and</li> <li>(ii) in the case of an asset that provided <b>spinning reserve</b> or <b>supplemental reserve</b>, the volume that was dispatched.</li> </ul> <p>(d) for self-supply configurations with excess generation, the delivery volume is based on <b>metered energy</b>; and</p> <p>(e) for an import asset, the delivery volume is:</p> <ul style="list-style-type: none"> <li>(i) the volume in a validated <b>e-tag</b>; or</li> <li>(ii) in the case of an import asset where the <b>offer</b> price is greater than or equal to \$0.01 per MWh during the first two delivery hours that are subject to the limits referenced in Section 303.2 of the <b>ISO rules</b>, <i>Available Transfer Capability</i>, the volume in the <b>offer</b>.</li> </ul>	
11	(2)	<p>The <b>ISO</b> must adjust the delivery volumes identified in subsection 11(1) for each delivery hour to include any delivery volume adjustments due to any substitutions which was approved in accordance with Section 206.9 of the <b>ISO rules</b>, <i>Asset Substitution</i>, and as follows:</p> <ul style="list-style-type: none"> <li>(a) in the case of an asset that was impacted by a <b>transmission market constraint</b>, the volume that was curtailed will be added to the delivery volume identified in subsection 11(1);</li> <li>(b) in the case of a load asset that was armed for the provision of <b>load shed</b></li> </ul>	

Section	Subsection	Proposed language	Stakeholder comments
		<p><b>service</b>, the volume that was armed will be added to the delivery volume identified in subsection 11(1); or</p> <p>(c) in all other cases, no adjustments to the delivery volume identified in subsection 11(1).</p>	
11	(3)	<p>The <b>ISO</b> must calculate the assessment volume in MWh for an asset during each delivery hour established in subsection 3(2) as follows:</p> $\text{assessment volume} = \text{delivery volume} - (\text{capacity commitment volume} \times \text{balancing ratio})$ <p>where:</p> <p>delivery volume in MWh is the value in identified in subsection 11(2);</p> <p>capacity commitment volume in MWh means the quantity of electric energy expected to be delivered from an asset based on its <b>capacity commitment</b> during the supply shortfall hour or portion thereof; and</p> <p>balancing ratio is the value calculated in subsection 11(5).</p>	
11	(4)	<p>The <b>ISO</b> must establish the assessment volume in MWh for an asset for each delivery hour established in subsection 3(2) as follows:</p> <p>(a) for an asset with a <b>uniform capacity value</b> based on a <b>capacity factor</b> or <b>availability factor</b>, the assessment volume is calculated in accordance with subsection 11(3) and subject to any reallocation volumes which were approved in accordance with Section 206.10 of the <b>ISO rules, Volume Reallocation</b>;</p> <p>(b) for self-supply configurations with excess generation the assessment volume is calculated in accordance with subsection 11(3) and subject to any reallocation volumes which were approved in accordance with Section 206.10 of the <b>ISO rules, Volume Reallocation</b>;</p> <p>(c) for an import asset, the assessment volume is calculated in accordance with subsection 11(3) and subject to any reallocation volumes which were approved in accordance with Section 206.10 of the <b>ISO rules, Volume</b></p>	

Section	Subsection	Proposed language	Stakeholder comments
		<p><i>Reallocation</i>; or</p> <p>(d) for a load asset that provides a <b>guaranteed load reduction</b> or a <b>firm consumption level</b>:</p> <p>(i) if the delivery hour occurred on a <b>day</b> which the load asset was subject to a <b>delayed forced outage</b> or <b>automatic forced outage</b>, that is not the first day of that <b>delayed forced outage</b> or <b>automatic forced outage</b>, the assessment volume is 0 MWh;</p> <p>(ii) if the supply shortfall hour occurred on a <b>day</b> which the load asset was subject to a <b>planned outage</b>, the assessment volume is 0 MWh; or</p> <p>(iii) in all other cases, the assessment volume is calculated in accordance with subsection 11(3) and subject to any reallocation volumes which were approved in accordance with Section 206.10 of the <b>ISO rules</b>, <i>Volume Reallocation</i>.</p>	
11	(5)	<p>The <b>ISO</b> must calculate for each delivery hour established in subsection 3(2), the balancing ratio as follows:</p> $balancing\ ratio = \min\left\{\frac{\sum\ delivery\ volumes}{\sum\ capacity\ commitment\ volumes}, 1\right\}$ <p>where:</p> <p>delivery volumes in MWh is the values identified in subsection 11(2) for all assets subject to a <b>capacity commitment</b> in an <b>obligation period</b>; and</p> <p>capacity commitment volumes in MWh means, for each asset subject to a <b>capacity commitment</b> in an <b>obligation period</b>, the quantity of electric energy expected to be delivered from an asset based on its <b>capacity commitment</b> during the supply shortfall hour or portion thereof.</p>	
		<b>Under-delivery Adjustment</b>	
12	(1)	<p>The <b>ISO</b> must, when the assessment value determined in accordance with subsection 11(4) is negative, calculate the under-delivery adjustment in dollars for an asset as follows:</p>	

Section	Subsection	Proposed language	Stakeholder comments
		<p style="text-align: center;"><i>under-delivery adjustment = adjustment rate x assessment volume</i></p> <p>where:</p> <p style="padding-left: 40px;">adjustment rate in \$/MWh is calculated in accordance with subsection 12(2); and</p> <p style="padding-left: 40px;">assessment volume in MWh is the value determined in accordance with subsection 11(4).</p>	
12	(2)	<p>The <b>ISO</b> must calculate the adjustment rate in \$/MWh as follows:</p> <p style="text-align: center;"><i>adjustment rate = 60% x 1.3 x asset-specific penalty rate</i></p> <p>where asset-specific penalty rate in \$/MWh is determined in accordance with subsection 10(2).</p>	
12	(3)	<p>The <b>ISO</b> must, for each asset, cap the under-delivery adjustment amount for each <b>settlement period</b> to the lesser of:</p> <ul style="list-style-type: none"> <li>(a) the monthly cap determined in accordance with subsection 14(1); or</li> <li>(b) an amount equal to the annual cap determined in accordance with subsection 14(2) minus the sum of all under-delivery adjustments calculated in accordance with this subsection 12(3) for the prior <b>settlement periods</b> of the <b>obligation period</b>.</li> </ul>	
		<p><b>Over-delivery Adjustment</b></p>	
13	(1)	<p>The <b>ISO</b> must, when the assessment value determined in accordance with subsection 11(4) is positive, calculate the over-delivery adjustment in dollars for an asset as follows:</p> <p style="text-align: center;"><i>over-delivery adjustment = adjustment rate x assessment volume</i></p> <p>where:</p> <p style="padding-left: 40px;">adjustment rate in \$/MWh is calculated in accordance with subsection 13(2); and</p> <p style="padding-left: 40px;">assessment volume in MWh is the value determined in accordance with subsection 11(4).</p>	

Section	Subsection	Proposed language	Stakeholder comments
13	(2)	<p>The ISO must calculate the adjustment rate in \$/MWh as follows:</p> $adjustment\ rate = \frac{\sum under-delivery\ adjustments}{\sum positive\ assessment\ volumes}$ <p>where:</p> <ul style="list-style-type: none"> <li>under-delivery adjustments in dollars is determined in accordance with 12(3) for all assets subject to a <b>capacity commitment</b> in an <b>obligation period</b>; and</li> <li>positive assessment volumes in MWh are the positive values calculated in accordance with subsection 11(4) for all assets subject to a <b>capacity commitment</b> in an <b>obligation period</b>.</li> </ul>	
13	(3)	<p>The ISO must, for each asset, limit the over-delivery adjustment amount in dollars for a <b>settlement period</b> to an amount equal to the annual cap determined in accordance with subsection 15 minus the sum of all over-delivery adjustments determined in accordance with this subsection 13(3) for the prior <b>settlement periods</b> of the <b>obligation period</b>.</p>	
		<p><b>Maximum Payment Adjustments for Under-availability and Under-delivery</b></p>	
14	(1)	<p>The ISO must cap for each asset, any under-delivery adjustment for a <b>settlement period</b> at an amount in dollars equal to:</p> <ul style="list-style-type: none"> <li>(a) <math>monthly\ cap = capacity\ payment \times 3</math> where capacity payment in \$/month is the asset's monthly capacity payment calculated in accordance with Section 103.10 of the <b>ISO rules</b>, <i>Capacity Payment Calculation</i>; or</li> <li>(b) <math>monthly\ cap = default\ rate \times capacity\ commitment \times max\{supply\ shortfall\ hours, 20\}</math> where the default rate is \$417/MW.</li> </ul>	
14	(2)	<p>The ISO must cap for each asset, the sum of any under-availability adjustment and under-delivery adjustments for each <b>obligation period</b> at an amount in dollars equal to the greater of:</p>	

Section	Subsection	Proposed language	Stakeholder comments
		<p>(a) <i>annual cap = capacity payment x 12 x 1.3</i>            where capacity payment in \$/month is the asset's monthly capacity payment calculated in accordance with Section 103.10 of the <b>ISO rules</b>, <i>Capacity Payment Calculation</i>; or</p> <p>(b) <i>annual cap = default rate x <b>capacity commitment</b></i>            where the default rate is \$33,333/MW.</p>	
		<p><b>Maximum Payment Adjustments for Over-availability and Over-delivery</b></p>	
15		<p>The <b>ISO</b> must cap for each asset, the sum of any over-availability adjustment and over-delivery adjustments for an <b>obligation period</b> at an amount in dollars equal to the greater of:</p> <p>(a) <i>annual cap = capacity payment x 12</i>            where capacity payment means the assets monthly capacity payment in dollars determined in accordance with Section 103.10 of the <b>ISO rules</b>, <i>Capacity Payment Calculation</i>; or</p> <p>(b) <i>annual cap = default rate x <b>capacity commitment</b></i>            where the default rate is \$33,333/MW.</p>	<p>TCE submits that there should not be a cap on incentive payments and, accordingly, that this section is not required.</p>



**Please provide your comments on the following (as set out in AUC Rule 017 s. 13(b-j)):**

Item #		Stakeholder comments
1	whether you agree that the proposed new ISO Rule – Section 206.8, <i>Obligation Period Performance Assessments</i> relates to the capacity market and why or why not	
2	whether you agree that the proposed new ISO Rule – Section 206.8, <i>Obligation Period Performance Assessments</i> should [or should not] be in effect for a fixed term and why or why not	
3	whether you understand and agree with the objective or purpose of the proposed new ISO Rule – Section 206.8, <i>Obligation Period Performance Assessments</i> and whether, in your view, the proposed new ISO Rule – Section 206.8, <i>Obligation Period Performance Assessments</i> meets the objective or purpose	
4	how, in your view, the proposed new ISO Rule – Section 206.8, <i>Obligation Period Performance Assessments</i> affects the performance of the capacity market and the electricity market	<p>TCE submits that the overall penalty and incentive framework sends poor market signals and negatively affects the performance of the market. The framework both fails to incent strong overall performance and is excessively punitive for infrequent random events.</p> <p>In order to fix the framework, more value should be placed on the availability component of the penalty framework. Availability on average is far more within the control of a generator than availability in a very small number of random hours (EEA events). The current framework has the poor incentive of penalizing bad luck very strongly (EEA events) and penalizing systematically poor availability very weakly (availability hours).</p>
5	your views on any analysis conducted or commissioned by the AESO supporting the proposed new ISO Rule – Section 206.8, <i>Obligation Period Performance Assessments</i>	
6	whether you agree with the proposed new ISO Rule – Section 206.8, <i>Obligation Period Performance Assessments</i> taken together with all ISO rules and in light of the principle of a fair, efficient and openly competitive market	

Item #		Stakeholder comments
7	whether you would suggest any alternatives to the proposed new ISO Rule – Section 206.8, <i>Obligation Period Performance Assessments</i>	
8	whether you agree that the proposed provisional rule supports ensuring a reliable supply of electricity at a reasonable cost to customers and why or why not	
9	whether you agree that the proposed provisional rule supports the public interest and why or why not	

***Please provide your views on the type of content that should be included in an information document associated with the proposed new ISO Rule – Section 206.8, Obligation Period Performance Assessments.***

Proposed New ISO rule – Section 206.9, *Asset Substitution*

<b>Period of Comment:</b>	September 7, 2018	through	September 28, 2018	<b>Contact:</b>	Mark Thompson
<b>Comments From:</b>	TransCanada Energy Ltd. (TCE)			<b>Phone:</b>	403-920-5005
<b>Date [yyyy/mm/dd]:</b>	2018-09-28			<b>Email:</b>	markj_thompson@transcanada.com

***Please provide comments relating to the subsection of the proposed rule in the corresponding box. Please include any views on whether the language clearly articulates the requirement for either the AESO or a market participant, and provide any proposed alternative wording by blacklining the proposed language below.***

Section	Subsection	Proposed language	Stakeholder comments
		<b>Applicability</b>	
1		Section 206.9 applies to: <ul style="list-style-type: none"> <li>(a) a <b>capacity market participant</b>; and</li> <li>(b) the <b>ISO</b>.</li> </ul>	
		<b>Requirements</b> <b>Eligible Substitute Capacity</b>	
2	(1)	A <b>capacity market participant</b> with a <b>capacity commitment</b> may substitute all or a portion of its <b>capacity commitment</b> with <b>capacity</b> from 1 or more assets that are: <ul style="list-style-type: none"> <li>(a) subject to a <b>capacity commitment</b>:                             <ul style="list-style-type: none"> <li>(i) of 0 MW for the <b>obligation period</b>; or</li> <li>(ii) less than its <b>uniform capacity value</b> for the <b>obligation period</b>;</li> </ul> </li> <li>(b) not subject to a <b>transmission market constraint</b> during the substitution; and</li> <li>(c) in the case of <b>new capacity</b>, refurbished capacity or incremental capacity, qualified by the <b>ISO</b> pursuant to Section 206.1 of the <b>ISO rules</b>, <i>Qualification of Capacity</i> and will be energized and commissioned by the start date and</li> </ul>	

Section	Subsection	Proposed language	Stakeholder comments
		time of the substitution.	
2	(2)	<p>A <b>capacity market participant</b> may substitute <b>capacity</b> from one or more assets identified in subsection 2(1):</p> <ul style="list-style-type: none"> <li>(a) for a minimum of one <b>settlement interval</b>;</li> <li>(b) up to a maximum of an entire <b>obligation period</b>; and</li> <li>(c) for a duration that is a whole number of <b>settlement intervals</b>.</li> </ul>	
		<b>Asset Substitution Request</b>	
3	(1)	<p>A <b>capacity market participant</b> must, in order to substitute all or a portion of its <b>capacity commitment</b> with eligible substitute <b>capacity</b> in accordance with subsection 2, submit a complete request for substitution to the <b>ISO</b> prior to the start date and time of the substitution.</p>	
3	(2)	<p>A <b>capacity market participant</b> must, in the request referred to in subsection 3(1) submit the following information to the <b>ISO</b>:</p> <ul style="list-style-type: none"> <li>(a) the unique identifier of the asset providing substitute <b>capacity</b>;</li> <li>(b) evidence of agreement to substitute between all <b>capacity market participants</b> for the assets to the substitution;</li> <li>(c) the start date and time of the substitution;</li> <li>(d) the end date and time of the substitution;</li> <li>(e) the proposed substitute <b>capacity</b> in MW, which must be a whole value greater than or equal to 1;</li> <li>(f) if the <b>capacity market participant</b> is proposing multiple substitution requests for the same asset for the same duration, the total of all other proposed substitute <b>capacity</b> from other assets; and</li> <li>(g) any other information specified by the <b>ISO</b>.</li> </ul>	

Section	Subsection	Proposed language	Stakeholder comments
		<b>Asset Substitution Approval</b>	
4	(1)	<p>The <b>ISO</b> must, based on the information in the substitution request and any supporting documents provided pursuant to subsection 3, be satisfied that:</p> <ul style="list-style-type: none"> <li>(a) the substituted capacity is at least 1 MW;</li> <li>(b) the substitution has been approved by all applicable <b>capacity market participants</b> for the assets to the substitution;</li> <li>(c) the start date and time of the asset substitution is after the last <b>rebalancing auction</b> for an <b>obligation period</b>;</li> <li>(d) the duration of the asset substitution satisfies subsection 2(2);</li> <li>(e) the substitute <b>capacity</b> is equal to or less than the <b>capacity commitment</b> of the asset the <b>capacity market participant</b> submitted the request for;</li> <li>(f) if the <b>capacity market participant</b> is proposing multiple substitution requests for the same asset for the same duration, the total of all proposed substitute <b>capacity</b> must be less than or equal to the <b>capacity commitment</b> of the asset the <b>capacity market participant</b> submitted the request for; and</li> <li>(g) the substitute <b>capacity</b> is not otherwise approved for substitution pursuant to subsection 4(2) or requested for substitution with a different asset for the duration requested or portion thereof.</li> </ul>	It is unclear why bilateral trades are restricted to after the last auction. TCE submits that bilateral trades should be allowed at any time.
4	(2)	<p>The <b>ISO</b> must approve the substitution requested pursuant to subsection 3 for the asset if:</p> <ul style="list-style-type: none"> <li>(a) the request provided in subsection 3 is complete; and</li> <li>(b) the <b>ISO</b> is satisfied pursuant to subsection 4(1).</li> </ul>	
		<b>Delivery Assessment for Substitute Capacity</b>	

Section	Subsection	Proposed language	Stakeholder comments
6		<p>The <b>ISO</b> must, when calculating the under-delivery adjustment or over-delivery adjustment for approved substitute <b>capacity</b> in respect of the asset which requested the substitution, use the methodology in Section 206.8 of the <b>ISO rules</b>, <i>Obligation Period Performance Assessments</i> based on:</p> <ul style="list-style-type: none"> <li>(a) the technology of the substitute <b>capacity</b>;</li> <li>(b) any asset-specific penalty rates determined for the asset which requested the substitution;</li> <li>(c) any maximum payment adjustment amounts for under-delivery and over-delivery for the asset which requested the substitution.</li> </ul>	
		<p><b>Excess Delivery Volumes from an Asset Providing Substitute Capacity</b></p>	
7	(1)	<p>The <b>ISO</b> must calculate for each delivery hour and without regard to any approved substitutions, the delivery assessment volumes in accordance with Section 206.8 of the <b>ISO rules</b>, <i>Obligation Period Performance Assessments</i> for:</p> <ul style="list-style-type: none"> <li>(a) the asset providing substitute <b>capacity</b>; and</li> <li>(b) any asset approved for substitution with the asset in subsection 7(1)(a) for that delivery hour.</li> </ul>	<p>TCE submits that this calculation should be done for both delivery hours and availability hours. Asset substitution loses its value if uniform capacity value for the next five auctions continues to be calculated based on the volumes prior to substitution. Asset substitution should be akin to removing the obligation entirely from the participant and substituting it to another participant that takes on the rights and obligations of the capacity provider.</p>
7	(2)	<p>The <b>ISO</b> must, if the delivery assessment volume from subsection 7(1)(a) is positive, determine the excess delivery volume from that asset providing substitute <b>capacity</b> if the assessment volume is reduced to zero.</p>	
7	(3)	<p>The <b>ISO</b> must apportion the excess delivery volume from subsection 7(2) to any asset approved for substitution in that delivery hour and recalculate the delivery assessment volumes subject to the limitation that the recalculated delivery assessment volume of each applicable asset will be zero, if possible, or else less than zero and as follows:</p> <ul style="list-style-type: none"> <li>(a) apportion the excess delivery volume to any assets approved for substitution in the order that the request for substitution was received; and</li> <li>(b) apportion any remaining excess delivery volume back to the asset providing</li> </ul>	

Section	Subsection	Proposed language	Stakeholder comments
		substitute <b>capacity</b> without limitation on that assets delivery assessment volume.	



**Please provide your comments on the following (as set out in AUC Rule 017 s. 13(b-j)):**

Item #		Stakeholder comments
1	whether you agree that the proposed new ISO Rule – Section 206.9, <i>Asset Substitution</i> relates to the capacity market and why or why not	
2	whether you agree that the proposed new ISO Rule – Section 206.9, <i>Asset Substitution</i> should [or should not] be in effect for a fixed term and why or why not	
3	whether you understand and agree with the objective or purpose of the proposed new ISO Rule – Section 206.9, <i>Asset Substitution</i> and whether, in your view, the proposed new ISO Rule – Section 206.9, <i>Asset Substitution</i> meets the objective or purpose	
4	how, in your view, the proposed new ISO Rule – Section 206.9, <i>Asset Substitution</i> affects the performance of the capacity market and the electricity market	
5	your views on any analysis conducted or commissioned by the AESO supporting the proposed new ISO Rule – Section 206.9, <i>Asset Substitution</i>	
6	whether you agree with the proposed new ISO Rule – Section 206.9, <i>Asset Substitution</i> taken together with all ISO rules and in light of the principle of a fair, efficient and openly competitive market	
7	whether you would suggest any alternatives to the proposed new ISO Rule – Section 206.9, <i>Asset Substitution</i>	

Item #		Stakeholder comments
8	whether you agree that the proposed provisional rule supports ensuring a reliable supply of electricity at a reasonable cost to customers and why or why not	
9	whether you agree that the proposed provisional rule supports the public interest and why or why not	

***Please provide your views on the type of content that should be included in an information document associated with the proposed new ISO Rule – Section 206.9, Asset Substitution.***

Proposed New ISO rule – Section 206.10, *Volume Reallocation*

<b>Period of Comment:</b>	September 7, 2018	through	September 28, 2018	<b>Contact:</b>	Mark Thompson
<b>Comments From:</b>	TransCanada Energy Ltd. (TCE)			<b>Phone:</b>	403-920-5005
<b>Date [yyyy/mm/dd]:</b>	2018-09-28			<b>Email:</b>	markj_thompson@transcanada.com

***Please provide comments relating to the subsection of the proposed rule in the corresponding box. Please include any views on whether the language clearly articulates the requirement for either the AESO or a market participant, and provide any proposed alternative wording by blacklining the proposed language below.***

Section	Subsection	Proposed language	Stakeholder comments
		<b>Applicability</b>	
1		Section 206.10 applies to: (a) a <b>capacity market participant</b> ; and (b) the <b>ISO</b> .	
		<b>Requirements</b> <b>Eligible Reallocation Volumes for a Supply Shortfall Event</b>	
2		The <b>ISO</b> must, if an asset was assessed an over-delivery adjustment or under-delivery adjustment on a preliminary capacity market statement issued in accordance with Section 103.9 of the <b>ISO rules</b> , <i>Capacity Market Financial Statement</i> , inform a <b>capacity market participant</b> no later than 1 <b>business day</b> following the issuance of the preliminary capacity market statement of the following for each delivery hour: (a) the asset’s delivery volume in MWh; (b) the balancing ratio; and (c) the asset’s positive or negative delivery assessment volume, as applicable, determined in accordance with Section 206.8 of the <b>ISO rules</b> , <i>Obligation Performance Period Assessments</i> which was included on the preliminary	

Section	Subsection	Proposed language	Stakeholder comments
		capacity market statement.	
		<b>Reallocation Request</b>	
3	(1)	A <b>capacity market participant</b> must, in order to reallocate positive or negative delivery assessment volumes between different assets, submit a complete request to reallocate volumes to the <b>ISO</b> no later than 5 <b>business days</b> following receipt of the volume reallocation information issued in accordance with subsection 2.	
3	(2)	A <b>capacity market participant</b> must in the request referred to in subsection 3(1) include the following information to the <b>ISO</b> : <ul style="list-style-type: none"> <li>(a) the unique identifier of the asset with positive delivery assessment volume;</li> <li>(b) the unique identifier of the asset with negative delivery assessment volume;</li> <li>(c) evidence of agreement to reallocate between all <b>capacity market participants</b> for the assets to the reallocation;</li> <li>(d) the supply shortfall hour which the volume reallocation applies;</li> <li>(e) the proposed reallocation volume in MWh, which must be an integer value;</li> <li>(f) if the <b>capacity market participant</b> is proposing multiple volume reallocation requests for the same asset during the supply shortfall hour or portion thereof, the total of all other proposed reallocation volumes to other assets.</li> </ul>	The AESO should confirm that an asset with no obligation and/or no uniform capacity value can engage in this reallocation. UCV and/or an obligation should not be required to participate in reallocation.
3	(3)	The <b>ISO</b> may request additional clarification or information regarding a volume reallocation request or supporting documents from the <b>capacity market participant</b> .	
		<b>Volume Reallocation Approval</b>	
4	(1)	The <b>ISO</b> must, based on the information in the volume reallocation request and any supporting documents provided pursuant to subsection 3, be satisfied that: <ul style="list-style-type: none"> <li>(a) one asset has a positive delivery assessment volume and the other asset has a negative delivery assessment volume;</li> </ul>	

Section	Subsection	Proposed language	Stakeholder comments
		<ul style="list-style-type: none"> <li>(b) the volume reallocation is in respect of the same supply shortfall hour;</li> <li>(c) for the asset with a positive delivery assessment volume:               <ul style="list-style-type: none"> <li>(i) the proposed reallocation volume is less than or equal to the positive delivery assessment volume of the asset as set out in accordance with subsection 2; and</li> <li>(ii) if the asset is participating in volume reallocation with multiple other assets, the sum any proposed or approved reallocation volumes from the asset to all other assets must be less than or equal to the positive delivery assessment volume of the asset as set out in accordance with subsection 2;</li> </ul> </li> <li>(d) for the asset with a negative delivery assessment volume:               <ul style="list-style-type: none"> <li>(i) the magnitude of the proposed reallocation volume is less than or equal to the magnitude of the negative delivery assessment volume of the asset as set out in accordance with subsection 2; and</li> <li>(ii) if the asset is participating in volume reallocation with multiple other assets, the magnitude of the sum any proposed or approved reallocation volumes from the asset to all other assets must be less than or equal to the magnitude of the negative delivery assessment volume of the asset as set out in accordance with subsection 2;</li> </ul> </li> </ul>	
4	(2)	<p>The <b>ISO</b> must approve the reallocation volume requested pursuant to subsection 3 for an asset if:</p> <ul style="list-style-type: none"> <li>(a) the request made pursuant to subsection 3 is complete; and</li> <li>(b) the <b>ISO</b> is satisfied pursuant to subsection 4(1).</li> </ul>	
		<p><b>Adjustments of Approved Reallocated Volumes</b></p>	
5		<p>The <b>ISO</b> must adjust approved reallocation volumes if the approved reallocation volumes were not based on energy determined on a final basis from the <b>settlement period 5</b> months following the <b>month</b> with the applicable delivery hour.</p>	

Section	Subsection	Proposed language	Stakeholder comments
		<b>Revisions to Delivery Assessment Volumes</b>	
6	(1)	The <b>ISO</b> must, recalculate the under-delivery adjustment or over-delivery adjustment for an asset pursuant to Section 206.8 of the <b>ISO rules</b> , <i>Obligation Period Performance Assessments</i> to account for any reallocation volumes approved and adjusted pursuant to subsection 5 for the relevant <b>settlement period</b> .	
6	(2)	The <b>ISO</b> must replace the applicable under-delivery adjustment or over-delivery adjustment for the asset which were included in the preliminary capacity market statement for that <b>settlement period</b> with the updated under-delivery adjustment or over-delivery adjustment recalculated in accordance with subsection 5 for the final capacity market statement for that <b>settlement period</b> .	

**Please provide your comments on the following (as set out in AUC Rule 017 s. 13(b-j)):**

Item #		Stakeholder comments
1	whether you agree that the proposed new ISO Rule – Section 206.10, <i>Volume Reallocation</i> relates to the capacity market and why or why not	
2	whether you agree that the proposed new ISO Rule – Section 206.10, <i>Volume Reallocation</i> should [or should not] be in effect for a fixed term and why or why not	
3	whether you understand and agree with the objective or purpose of the proposed new ISO Rule – Section 206.10, <i>Volume Reallocation</i> and whether, in your view, the proposed new ISO Rule – Section 206.10, <i>Volume Reallocation</i> meets the objective or purpose	
4	how, in your view, the proposed new ISO Rule – Section 206.10, <i>Volume Reallocation</i> affects the performance of the capacity market and the electricity market	
5	your views on any analysis conducted or commissioned by the AESO supporting the proposed new ISO Rule – Section 206.10, <i>Volume Reallocation</i>	
6	whether you agree with the proposed new ISO Rule – Section 206.10, <i>Volume Reallocation</i> taken together with all ISO rules and in light of the principle of a fair, efficient and openly competitive market	
7	whether you would suggest any alternatives to the proposed new ISO Rule – Section 206.10, <i>Volume Reallocation</i>	



Item #		Stakeholder comments
8	whether you agree that the proposed provisional rule supports ensuring a reliable supply of electricity at a reasonable cost to customers and why or why not	
9	whether you agree that the proposed provisional rule supports the public interest and why or why not	

***Please provide your views on the type of content that should be included in an information document associated with the proposed new ISO Rule – Section 206.10, Volume Reallocation.***

Proposed New ISO rule – Section 206.11, *Energy and Ancillary Services Offset for Assets*

**Period of Comment:** September 7, 2018 through September 28, 2018      **Contact:** Mark Thompson  
**Comments From:** TransCanada Energy Ltd. (TCE)      **Phone:** 403-920-5005  
**Date [yyyy/mm/dd]:** 2018-09-28      **Email:** markj\_thompson@transcanada.com

**Please provide comments relating to the subsection of the proposed rule in the corresponding box. Please include any views on whether the language clearly articulates the requirement for either the AESO or a market participant, and provide any proposed alternative wording by blacklining the proposed language below.**

Section	Subsection	Proposed language	Stakeholder comments
		<b>Applicability</b>	
1		Section 206.11 applies to: (a) the <b>ISO</b> ; and (b) a <b>capacity market participant</b> requiring an energy and ancillary services offset for and asset.	
		<b>Requirements</b> <b>Calculation of Energy and Ancillary Services Offset for Assets</b>	
2	(1)	The <b>ISO</b> must, when required under Section 201.15 of the <b>ISO rules</b> , <i>Delisting</i> and Section 206.8 of the <b>ISO rules</b> , <i>Capacity Market Mitigation</i> , for every <b>obligation period</b> or portion of an <b>obligation period</b> , calculate the energy and ancillary services offset value in accordance with the following formula:  $\text{EAS Offset}_t = \frac{(\text{Forward Power Price}_t - \text{Energy Market Expense}_t) \times \text{Forward Product Energy}_t + \text{Other non - electricity market revenues}}{\text{Nameplate Capacity} \times 1000}$ where; (i) <i>t</i> equals the <b>obligation period</b> or portion of an <b>obligation period</b> , for	TCE reiterates its concern is that the AESO is exclusively relying on the forward price. TCE submits that minimum liquidity requirements must be met before an index can be used.  TCE submits that a minimum number of counterparties must have traded an index for it to be utilized. Data availability from ICE should be examined to assess relevant screens, etc.  It should also be noted that the use of the forward market systematically makes the market less efficient at signaling investment needs. For example, if the market is expected to be over supplied, forward prices will fall. This lowers offsets from energy and ancillary services. Net CONE increases as a result, which sends a stronger signal to

Section	Subsection	Proposed language	Stakeholder comments
		<p>which the energy and ancillary services offset is being determined;</p> <p>(ii) EAS Offset <math>t</math> in \$/kW, is the revenue less variable cost offset of the asset and includes energy and ancillary services revenues as well as all other non-electricity market revenues the asset may be expected to obtain such as revenues from the sale of renewable attributes an for <b>obligation period <math>t</math></b>;</p> <p>(iii) Forward Power Price <math>t</math> is in \$/MWh and is the weighted average of the settlements matching the <b>obligation period <math>t</math></b>, where the settlements are the average over a period determined by the <b>ISO</b>, of the published NGX forward power product in Appendix 1 that yields the highest EAS Offset <math>t</math> for <b>obligation period <math>t</math></b>.</p> <p>(iv) Energy Market Expense <math>t</math> is the energy market expenses for the asset in \$/MWh for <b>obligation period <math>t</math></b> calculated in accordance with subsection 2(5) below;</p> <p>(v) Forward Product Energy <math>t</math> is the forward product energy value in MWh for <b>obligation period <math>t</math></b> calculated in accordance with subsection 2(4) below; and</p> <p>(vi) Nameplate Capacity is the <b>maximum capability</b> of the asset.</p>	<p>build.</p>
2	(2)	<p>The <b>ISO</b> must, when determining the Forward Power Price <math>t</math> for hydro assets, wind assets, storage assets, solar assets and thermal assets with an availability factor less than 50%, multiply the forward power price with a forward power price adjustment factor, as calculated in subsection 2(3).</p>	
2	(3)	<p>The <b>ISO</b> must calculate the forward power price adjustment factor as the realized energy revenues from the immediately preceding <b>obligation period</b> divided by the average <b>pool price</b> from the immediately preceding <b>obligation period</b> where the realized energy revenues equal hourly production of the asset in MWh multiplied by the <b>pool price</b> in each of those hours.</p>	
2	(4)	<p>The <b>capacity market participant</b> must provide the <b>ISO</b> with the expectation of forward</p>	

Section	Subsection	Proposed language	Stakeholder comments
		product energy production in MWh for the asset during the <b>obligation period</b> $t$ or a portion of an obligation period, for which the generation is being determined.	
2	(5)	<p>The <b>ISO</b> must, in calculating the EAS Offset <math>t</math> under subsection 2(1) above, calculate the Energy Market Expense <math>t</math> using the following formula:</p> $\begin{aligned} \text{Energy Market Expense}_t &= [\text{Forward Fuel Price}_t + (1 + \text{Commodity Fuel Charge}_t)] \times \text{Heat Rate}_t \\ &+ \text{Variable Operations and Maintenance}_t \\ &+ (\text{Emission Intensity} - \text{Established Benchmark}_t) \times \text{Carbon Price}_t \\ &+ \text{Transmission Losses}_t + \text{Trading Charge}_t \end{aligned}$ <p>where;</p> <ul style="list-style-type: none"> <li>(i) <math>t</math> equals the <b>obligation period</b>, or the portion of an <b>obligation period</b>, for which the energy and ancillary services offset is being determined;</li> <li>(ii) Forward Fuel Price <math>t</math> is <ul style="list-style-type: none"> <li>(A) For natural gas fueled assets: the weighted average of the settlements matching <b>obligation period</b> <math>t</math>, where the settlements are the average over the period determined by the <b>ISO</b> in subsection 2(1)(i), of NGX Phys, FP (CA/GJ), AB-NIT;</li> <li>(B) For thermal assets that are not fueled by natural gas: the <b>capacity market participant</b> must provide the <b>ISO</b> the expected variable cost of fuel in \$/GJ, including variable transportation charges, for the asset during the <b>obligation period</b> <math>t</math>.</li> <li>(C) For non thermal assets: this variable does not apply</li> </ul> </li> <li>(iii) Commodity Fuel Charge <math>t</math> relates to natural gas fueled assets only and is the most recent 12 <b>month</b> average of published NOVA Gas Transmission Ltd NGTL Fuel Usage and Measurement Variance;</li> <li>(iv) Heat Rate relates to thermal assets only; the <b>capacity market participant</b> must provide the <b>ISO</b> the fuel consumption efficiency of the asset in GJ/MWh for the <b>obligation period</b> <math>t</math>;</li> </ul>	

Section	Subsection	Proposed language	Stakeholder comments
		<p>(v) Variable Operations and Maintenance <math>_t</math> the <b>capacity market participant</b> must provide the <b>ISO</b> the variable operations and maintenance costs of the asset for <b>obligation period <math>t</math></b> in \$/MWh, excluding any fuel related costs and any amortized or capitalized costs;</p> <p>(vi) Emission Intensity is the amount of CO2 emitted by the asset when producing a MWh of electricity; the <b>capacity market participant</b> must provide the <b>ISO</b> the Emissions Intensity for the asset in tonnes of CO2/MWh;</p> <p>(vii) Established Benchmark <math>_t</math> is the weighted average of the calendar year values matching <b>obligation period <math>t</math></b> for an established benchmark for electricity published by a public authority;</p> <p>(viii) Carbon Price <math>_t</math> is the weighted average of the calendar year values matching <b>obligation period <math>t</math></b> for the carbon price published by a public authority for carbon emissions in Alberta;</p> <p>(ix) Transmission Losses <math>_t</math> is the transmission loss value for <b>obligation period <math>t</math></b> in \$/MWh calculated as the loss factor of the asset multiplied the Forward Power Price <math>_t</math> where:</p> <ul style="list-style-type: none"> <li>(i) the loss factor is the most recent published loss factor for the asset published on the AESO website; and</li> <li>(ii) Forward Power Price <math>_t</math> for <b>obligation period <math>t</math></b> is the value in subsection 2(1)(a)(iii).</li> </ul> <p>(x) Energy Market Trading Charge <math>_t</math> is the most recent energy market trading charge in \$/MWh published on the AESO website.</p>	

*Please provide your comments on this rule's appendices:*

**Please provide your comments on the following (as set out in AUC Rule 017 s. 13(b-j)):**

Item #		Stakeholder comments
1	whether you agree that the proposed new ISO Rule – Section 206.11, <i>Energy and Ancillary Services Offset for Assets</i> relates to the capacity market and why or why not	
2	whether you agree that the proposed new ISO Rule – Section 206.11, <i>Energy and Ancillary Services Offset for Assets</i> should [or should not] be in effect for a fixed term and why or why not	
3	whether you understand and agree with the objective or purpose of the proposed new ISO Rule – Section 206.11, <i>Energy and Ancillary Services Offset for Assets</i> and whether, in your view, the proposed new ISO Rule – Section 206.11, <i>Energy and Ancillary Services Offset for Assets</i> meets the objective or purpose	
4	how, in your view, the proposed new ISO Rule – Section 206.11, <i>Energy and Ancillary Services Offset for Assets</i> affects the performance of the capacity market and the electricity market	
5	your views on any analysis conducted or commissioned by the AESO supporting the proposed new ISO Rule – Section 206.11, <i>Energy and Ancillary Services Offset for Assets</i>	
6	whether you agree with the proposed new ISO Rule – Section 206.11, <i>Energy and Ancillary Services Offset for Assets</i> taken together with all ISO rules and in light of the principle of a fair, efficient and openly competitive market	



Item #		Stakeholder comments
7	whether you would suggest any alternatives to the proposed new ISO Rule – Section 206.11, <i>Energy and Ancillary Services Offset for Assets</i>	
8	whether you agree that the proposed provisional rule supports ensuring a reliable supply of electricity at a reasonable cost to customers and why or why not	
9	whether you agree that the proposed provisional rule supports the public interest and why or why not	

***Please provide your views on the type of content that should be included in an information document associated with the proposed new ISO Rule – Section 206.11, Energy and Ancillary Services Offset for Assets.***

Proposed New ISO rule – Section 303.2, Available Transfer Capability

**Period of Comment:** September 7, 2018 through September 28, 2018      **Contact:** Mark Thompson  
**Comments From:** TransCanada Energy Ltd. (TCE)      **Phone:** 403-920-5005  
**Date [yyyy/mm/dd]:** 2018-09-28      **Email:** markj\_thompson@transcanada.com

*Please provide comments relating to the subsection of the proposed rule in the corresponding box. Please include any views on whether the language clearly articulates the requirement for either the AESO or a market participant, and provide any proposed alternative wording by blacklining the proposed language below.*

Section	Subsection	Proposed language	Stakeholder comments
		<b>Applicability</b>	
1		Section 303.2 applies to: (c) the <b>ISO</b> .	
		<b>Capability Limits Determinations</b>	
2	(1)	The <b>ISO</b> must determine and post on the AESO website the following capability limits in MW prior to each <b>settlement interval</b> , and also on an as required basis when <b>interconnected electric system</b> operating conditions change: (a) the <b>Alberta interchange capability</b> ; (b) the import and export capability of the combined British Columbia and Montana transfer paths; and (c) the import <b>available transfer capability</b> and export <b>available transfer capability</b> for each of the British Columbia, Montana and Saskatchewan transfer paths.	
2	(2)	Once the <b>ISO</b> has determined the limits under subsection 2(1), it must ensure that: (a) the amount in MW of all transmission service for all import and export <b>interchange transactions</b> for all transfer paths does not exceed the <b>Alberta</b>	

Section	Subsection	Proposed language	Stakeholder comments
		<p><b>interchange capability</b> limit referenced in subsection 2(1)(a);</p> <p>(b) the amount in MW of all transmission service for all import and export <b>interchange transactions</b> for the combined British Columbia and Montana transfer paths does not exceed the combined limit referenced in subsection 2(1)(b); and</p> <p>(c) the amount in MW of all transmission service for all import and export <b>interchange transactions</b> for an individual transfer path does not exceed the limit for that transfer path referenced in subsection 2(1)(c).</p>	
		<p><b>Total Transfer Capability Determinations and Available Transfer Capability Calculations</b></p>	
3	(1)	<p>The <b>ISO</b> must determine the import <b>total transfer capability</b> and the export <b>total transfer capability</b> for an individual transfer path, in order to calculate the import <b>available transfer capability</b> and the export <b>available transfer capability</b> for that transfer path.</p>	
3	(2)	<p>The <b>ISO</b> must make the determinations and calculations under subsection 3(1) with reference to the applicable provisions of any related <b>reliability standards</b>.</p>	
		<p><b>Available Transfer Capability for a Transfer Path</b></p>	
4	(1)	<p>The <b>ISO</b> must use the calculated import <b>available transfer capability</b> and the export <b>available transfer capability</b> limits as referenced under subsection 2(1)(c) for an individual transfer path, for scheduling <b>interchange transactions</b> on that transfer path.</p>	
		<p><b>Available Transfer Capability Allocations for Transfer Paths</b></p>	
5	(1)	<p>At approximately 85 minutes prior to a <b>settlement interval</b> the <b>ISO</b> must determine whether the capability limits under subsection 2(2) may be exceeded, and if so then the <b>ISO</b> must determine the individual transfer path <b>available transfer capability</b> allocations in accordance with the following procedures:</p> <p>(a) the <b>ISO</b> must calculate the net <b>interchange transaction</b> amount in MW, at each potential <b>system marginal price</b>, taking into account:</p>	

Section	Subsection	Proposed language	Stakeholder comments
		<ul style="list-style-type: none"> <li>(i) the energy <b>interchange transaction</b> amounts in MW, and the prices for <b>bids and offers</b>;</li> <li>(ii) the <b>interchange transaction</b> amount in MW for <b>ancillary services</b>; and</li> <li>(iii) applicable counterflows; and</li> <li>(b) the <b>ISO</b> may exclude any <b>wheel through transaction</b> amounts in MW if those amounts will not result in any limits or allocations under this section 303.2 being exceeded.</li> </ul>	
5	(2)	<p>The <b>ISO</b> must comply with the following additional procedures in the following sequence to determine the allocation of each of the individual transfer path <b>available transfer capability</b> allocations:</p> <ul style="list-style-type: none"> <li>(a) the net amount in MW of all <b>interchange transactions</b> for the individual transfer path must be compared to the limit determined for that individual transfer path as referenced in subsection 2(1)(c), and: <ul style="list-style-type: none"> <li>(i) if that net amount is equal to or greater than the limit, then the allocation must be set at that limit; and</li> <li>(ii) if that net amount is less than the limit, then the allocation must be set at that net amount;</li> </ul> </li> <li>(b) for the British Columbia and Montana transfer paths, the sum in MW of their individual transfer path allocations calculated under subsection 5(2)(a) must be compared to the combined British Columbia and Montana transfer path limit referenced in subsection 2(1)(b);</li> <li>(c) if the combined transfer path limit of subsection 2(1)(b) is not exceeded, then the allocations must remain as determined in accordance with subsection 5(2)(a), but if it is exceeded, then a further allocation must be done in accordance with the following sequence in order to ensure the combined transfer path limit as determined under subsection 2(1)(b) is not exceeded: <ul style="list-style-type: none"> <li>(i) first, the British Columbia, or the Montana, or both the British Columbia and the Montana transfer path allocations must be reduced as necessary by the applicable <b>ancillary services</b> type <b>interchange</b></li> </ul> </li> </ul>	<p>In subsection 5(2)(c)(iii), “10(2)(b)” should be “5(2)(b)”.</p>

Section	Subsection	Proposed language	Stakeholder comments
		<p><b>transaction</b> amounts in MW;</p> <p>(ii) second, the British Columbia, or the Montana, or both the British Columbia and the Montana transfer path allocations must be reduced as necessary by the applicable energy <b>interchange transaction</b> amounts in MW, with the reduction being in reverse merit order based on <b>bid</b> and <b>offer</b> prices; and</p> <p>(iii) third, if there are equally priced British Columbia and Montana energy <b>interchange transactions</b>, then the British Columbia and Montana allocations must be reduced on a pro rata basis using the following formula:</p> <p style="padding-left: 40px;">the MW allocation for each of the Montana and British Columbia transfer paths as determined in accordance with subsection 5(2)(a), as may be reduced under subsections 5(2)(c)(i) and 5(2)(c)(ii);</p> <p style="padding-left: 40px;">divided by</p> <p style="padding-left: 40px;">the sum in MW calculated under in subsection 10(2)(b) as may be reduced under subsections 5(2)(c)(i) and 5(2)(c)(ii);</p> <p style="padding-left: 40px;">multiplied by</p> <p style="padding-left: 40px;">the amount by which that sum exceeds the combined British Columbia and Montana transfer path limit referenced in subsection 2(1)(b);</p> <p>(d) the allocation resulting from subsection 5(2)(c) plus the Saskatchewan transfer path allocation calculated under subsection 5(2)(a) must then be compared to the <b>Alberta interchange capability</b> limit referenced in subsection 2(1)(a); and</p> <p>(e) if the <b>Alberta interchange capability</b> limit is not exceeded, then the allocations must remain as determined in accordance with subsections 5(2)(a) and 5(2)(c), but if that limit is exceeded, then a further allocation of <b>available transfer capability</b> must be done in accordance with the following sequence in order to ensure that the <b>Alberta interchange capability</b> limit as determined</p>	

Section	Subsection	Proposed language	Stakeholder comments
		<p>under subsection 2(1)(a) is not exceeded:</p> <ul style="list-style-type: none"> <li>(i) first, any individual 1, or any combination of the British Columbia, Montana, and Saskatchewan transfer path allocations must be reduced as necessary by the applicable <b>ancillary service</b> type <b>interchange transaction</b> amount in MW;</li> <li>(ii) second, any individual 1, or any combination of the British Columbia, Montana, and Saskatchewan transfer path allocations must be reduced as necessary by the applicable energy <b>interchange transaction</b> amounts in MW, with the reduction being in reverse merit order based on <b>bid</b> and <b>offer</b> prices; and</li> <li>(iii) third, if there are equally priced British Columbia, Montana and Saskatchewan energy <b>interchange transactions</b>, then the British Columbia, Montana and Saskatchewan allocations must be reduced on a pro rata basis using the following formula: <ul style="list-style-type: none"> <li>the MW allocation for each of the Montana and British Columbia transfer paths as determined in accordance with subsection 5(2)(c) and the Saskatchewan transfer path allocation under subsection 5(2)(a), as may be reduced under subsections 5(2)(e)(i), and 5(2)(e)(ii);</li> <li>divided by</li> <li>the sum in MW referred to in subsection 5(2)(d), as may be reduced under subsections 5(2)(e)(i) and 5(2)(e)(ii);</li> <li>multiplied by</li> <li>the amount by which that sum exceeds the <b>Alberta interchange capability</b> limit referenced in subsection 2(1)(a);</li> </ul> </li> </ul>	
5	(3)	<p>At approximately 85 minutes prior to a <b>settlement interval</b>, the <b>ISO</b> must post on the AESO website:</p> <ul style="list-style-type: none"> <li>(a) the total in MW of all energy import <b>offers</b> and export <b>bids</b> received for each transfer path and the combinations of transfer paths referenced under subsection 2, at 2 hours prior to the start of the <b>settlement interval</b> in</li> </ul>	

Section	Subsection	Proposed language	Stakeholder comments
		<p>accordance with section 203.1 of the <b>ISO rules</b>, <i>Offers and Bids for Energy</i>;</p> <p>(b) the limits referenced under subsection 2; and</p> <p>(c) all allocations made under this subsection 5.</p>	
5	(4)	<p>If, after 85 minutes prior to a <b>settlement interval</b>, any of the limits referenced in subsection 2 have changed, then the <b>ISO</b> must follow the procedures and sequence set out in Section 303.3, <i>Intertie Path Operations</i>.</p>	



**Please provide your comments on the following (as set out in AUC Rule 017 s. 13(b-j)):**

Item #		Stakeholder comments
1	whether you agree that the proposed new ISO Rule – Section 303.2, <i>Available Transfer Capability</i> relates to the capacity market and why or why not	
2	whether you agree that the proposed new ISO Rule – Section 303.2, <i>Available Transfer Capability</i> should [or should not] be in effect for a fixed term and why or why not	
3	whether you understand and agree with the objective or purpose of the proposed new ISO Rule – Section 303.2, <i>Available Transfer Capability</i> and whether, in your view, the proposed new ISO Rule – Section 303.2, <i>Available Transfer Capability</i> meets the objective or purpose	
4	how, in your view, the proposed new ISO Rule – Section 303.2, <i>Available Transfer Capability</i> affects the performance of the capacity market and the electricity market	
5	your views on any analysis conducted or commissioned by the AESO supporting the proposed new ISO Rule – Section 303.2, <i>Available Transfer Capability</i>	
6	whether you agree with the proposed new ISO Rule – Section 303.2, <i>Available Transfer Capability</i> taken together with all ISO rules and in light of the principle of a fair, efficient and openly competitive market	
7	whether you would suggest any alternatives to the proposed new ISO Rule – Section 303.2, <i>Available Transfer Capability</i>	

Item #		Stakeholder comments
8	whether you agree that the proposed provisional rule supports ensuring a reliable supply of electricity at a reasonable cost to customers and why or why not	
9	whether you agree that the proposed provisional rule supports the public interest and why or why not	

***Please provide your views on the type of content that should be included in an information document associated with the proposed new ISO Rule – Section 303.2, Available Transfer Capability.***

Proposed New ISO rule – Section 303.3, *Intertie Path Operations*

<b>Period of Comment:</b>	September 7, 2018	through	September 28, 2018	<b>Contact:</b>	Mark Thompson
<b>Comments From:</b>	TransCanada Energy Ltd. (TCE)			<b>Phone:</b>	403-920-5005
<b>Date [yyyy/mm/dd]:</b>	2018-09-28			<b>Email:</b>	markj_thompson@transcanada.com

***Please provide comments relating to the subsection of the proposed rule in the corresponding box. Please include any views on whether the language clearly articulates the requirement for either the AESO or a market participant, and provide any proposed alternative wording by blacklining the proposed language below.***

Section	Subsection	Proposed language	Stakeholder comments
		<b>Applicability</b>	
1		Section 303.3 applies to: (a) the ISO.	
		<b>Requirements</b> <b>Subsection Title (no numbers)</b>	
2	(1)	If, after carrying out the <b>available transfer capability</b> allocation procedures set out in Section 303.2 of the <b>ISO rules</b> , <i>Available Transfer Capability</i> , and based on the <b>e-tags</b> submitted under Section 203.6 of the <b>ISO rules</b> , <i>Market Requirements for Interchange Transactions</i> , the <b>available transfer capability</b> limits referenced in Section 303.2 of the <b>ISO rules</b> , <i>Available Transfer Capability</i> are still exceeded in a <b>settlement interval</b> , then the <b>ISO</b> must reduce <b>interchange transactions</b> in accordance with the sequential procedures set out in this subsection 2.	
2	(2)	The <b>ISO</b> must determine the effective <b>interchange transactions</b> for mitigating a limit being exceeded at the <b>Alberta interchange capability</b> level, the combined Montana and BC transfer path capability level, or at each individual transfer path level.	
2	(3)	The <b>ISO</b> may determine that any <b>wheel through transaction</b> is not effective in mitigating	

Section	Subsection	Proposed language	Stakeholder comments
		an exceedance, based on its analysis under subsection 2(2).	
2	(4)	<p>The <b>ISO</b> must comply with the following procedures in the following sequence to mitigate the remaining exceedance:</p> <ul style="list-style-type: none"> <li>(a) assess all <b>interchange transactions</b> for transmission services against the limits and allocations referred to in Section 303.2 of the <b>ISO rules</b>, <i>Available Transfer Capability</i>, and determine the <b>interchange transactions</b> that will be effective in mitigating the constraint;</li> <li>(b) <b>dispatch</b> any effective <b>operating blocks</b> in reverse <b>merit order</b> in accordance with section 203.2 of the <b>ISO rules</b>, <i>Issuing Dispatches for Energy</i>;</li> <li>(c) where necessary to manage system reliability in real-time, curtail the transmission service of <b>interchange transactions</b> under the sequencing set out in subsection 2(4)(d), mitigating the constraint in the following order at the following levels, where effective: <ul style="list-style-type: none"> <li>(i) an individual transfer path limit level;</li> <li>(ii) the combined Montana and British Columbia transfer path level; or</li> <li>(iii) the <b>Alberta interchange capability</b> level; and</li> </ul> </li> <li>(d) curtail at the effective level: <ul style="list-style-type: none"> <li>(i) inadvertent energy payback <b>interchange transactions</b>, prior to the curtailment of any <b>interchange transactions</b> on the Saskatchewan transfer path;</li> <li>(ii) transmission services of any effective <b>interchange transactions</b> for <b>ancillary services</b>;</li> <li>(iii) where reasonably practicable, transmission services of any effective energy <b>interchange transactions</b> based on <b>bid</b> and <b>offer</b> prices in reverse <b>merit order</b>; and</li> <li>(iii) transmission services of any effective energy <b>interchange transactions</b> on a pro rata basis in accordance with the following formula:</li> </ul> </li> </ul>	

Section	Subsection	Proposed language	Stakeholder comments
		<ul style="list-style-type: none"> <li>(A) scheduled amount of each effective <b>interchange transaction</b>;</li> <li>(B) multiplied by the total amount necessary to mitigate the exceedance; and</li> <li>(C) divided by total scheduled amount of all effective <b>interchange transactions</b>.</li> </ul>	
2	(5)	The <b>ISO</b> must, if after following the procedures in subsection 2(4), and the <b>available transfer capability has</b> subsequently increased in the same <b>settlement interval</b> , apply the procedures in subsection 2(4)(c) and 2(4)(d) in the reverse order, where reasonably practicable.	Please clarify how subsection 2(5), which was not contained within subsection 11(5) of the current ISO Rule 203.6, relates to the capacity market.
		<b>Interchange Schedule and Dispatches by the ISO</b>	
3	(1)	Subject to the provisions of this section 303.3, the <b>ISO</b> must include in the <b>interchange schedule</b> the energy components of <b>interchange transactions</b> if the <b>e-tags</b> for the <b>interchange transactions</b> have been: <ul style="list-style-type: none"> <li>(a) received and validated by the <b>ISO</b> as set out in Section 203.6 of the <b>ISO rules, Market Requirements for Interchange Transactions</b>; and</li> <li>(b) approved by all other applicable approval entities.</li> </ul>	
3	(2)	The <b>ISO</b> must determine the <b>interchange schedule</b> for each transfer path taking into account the allocation set out in Section 303.2 of the ISO rules, <i>Available Transfer Capability Allocation</i> and the path limit management procedures set out in subsection 2.	
3	(3)	The <b>ISO</b> may initiate changes to an <b>interchange schedule</b> for a transfer path when required to address: <ul style="list-style-type: none"> <li>(a) a <b>dispatch</b> or <b>directive</b> for energy or <b>ancillary services</b>, including for an internal <b>transmission market constraint</b>;</li> <li>(b) <b>supply shortfall</b> or supply surplus matter;</li> <li>(c) a matter of <b>reliability</b> on the <b>interconnected electric system</b>, or a similar matter which may occur in any other <b>balancing authority area</b>;</li> </ul>	

Section	Subsection	Proposed language	Stakeholder comments
		(d) reserve sharing; or (e) any changes resulting from the procedures and sequencing set out in subsection 2.	
		<b>Saskatchewan Inadvertent Energy Management</b>	
4		If the <b>ISO</b> is required to manage an amount of inadvertent energy on the Saskatchewan transfer path, then: (a) the inadvertent energy is not eligible to set the <b>pool price</b> ; and (b) inadvertent energy payback on the Saskatchewan transfer path must not exceed 25 MW.	

**Please provide your comments on the following (as set out in AUC Rule 017 s. 13(b-j)):**

Item #		Stakeholder comments
1	whether you agree that the proposed new ISO Rule – Section 303.3, <i>Intertie Path Operations</i> relates to the capacity market and why or why not	
2	whether you agree that the proposed new ISO Rule – Section 303.3, <i>Intertie Path Operations</i> should [or should not] be in effect for a fixed term and why or why not	
3	whether you understand and agree with the objective or purpose of the proposed new ISO Rule – Section 303.3, <i>Intertie Path Operations</i> and whether, in your view, the proposed new ISO Rule – Section 303.3, <i>Intertie Path Operations</i> meets the objective or purpose	
4	how, in your view, the proposed new ISO Rule – Section 303.3, <i>Intertie Path Operations</i> affects the performance of the capacity market and the electricity market	
5	your views on any analysis conducted or commissioned by the AESO supporting the proposed new ISO Rule – Section 303.3, <i>Intertie Path Operations</i>	
6	whether you agree with the proposed new ISO Rule – Section 303.3, <i>Intertie Path Operations</i> taken together with all ISO rules and in light of the principle of a fair, efficient and openly competitive market	
7	whether you would suggest any alternatives to the proposed new ISO Rule – Section 303.3, <i>Intertie Path Operations</i>	



Item #		Stakeholder comments
8	whether you agree that the proposed provisional rule supports ensuring a reliable supply of electricity at a reasonable cost to customers and why or why not	
9	whether you agree that the proposed provisional rule supports the public interest and why or why not	

***Please provide your views on the type of content that should be included in an information document associated with the proposed new ISO Rule – Section 303.3, Intertie Path Operations.***

Proposed Amended ISO rule – Section 306.5, *Generation Outage Reporting*

<b>Period of Comment:</b>	September 7, 2018	through	September 28, 2018	<b>Contact:</b>	Mark Thompson
<b>Comments From:</b>	TransCanada Energy Ltd. (TCE)			<b>Phone:</b>	403-920-5005
<b>Date [yyyy/mm/dd]:</b>	2018-09-28			<b>Email:</b>	markj_thompson@transcanada.com

***Please provide comments relating to the subsection of the proposed amendments to the rule in the corresponding box. Please include any views on whether the language clearly articulates the requirement for either the AESO or a market participant, and provide any proposed alternative wording by blacklining the proposed language below.***

Section	Subsection	Proposed language	Stakeholder comments
		<b>Applicability</b>	
1		Section 306.5 applies to: <ul style="list-style-type: none"> <li>(a) a <b>pool participant</b> with a generating <b>source asset</b> with a <b>maximum capability</b> greater than or equal to 5 MW;</li> <li>(b) a <b>pool participant</b> that submits <b>offers</b> in the energy market for a generating <b>source asset</b> with a <b>maximum capability</b> that is greater than or equal to 1 MW and less than 5 MW;</li> <li>(c) a <b>legal owner</b> of a <b>source asset</b> described in subsections 1(a) and 1(b); and</li> <li>(d) the <b>ISO</b>.</li> </ul>	
		<b>Requirements</b> <b>General</b>	
2	(1)	A <b>pool participant</b> must, for any outage that results or will result in a change in <b>available capability</b> of: <ul style="list-style-type: none"> <li>(a) 1 MW or greater, for a generating <b>source asset</b> with a <b>maximum capability</b> that is greater than or equal to 1 MW and less than 5 MW; or</li> </ul>	

Section	Subsection	Proposed language	Stakeholder comments
		<p>(b) 5 MW or greater, for a generating <b>source asset</b> with a <b>maximum capability</b> greater than or equal to 5 MW, comply with the notification requirements set forth in subsections 3, 4 or 5, as applicable.</p>	
		<p><b>Planned Outage Notification Requirements</b></p>	<p>Section 3(2) is missing. TCE has no specific issues with respect to the 48-month requirement in this section. However, the AESO should provide a report within its IT system that permits a market participant to view all of its scheduled outages on an asset by asset basis.</p>
4	(1)	<p>A <b>pool participant</b> must, as soon as reasonably practicable, in respect of a <b>delayed forced outage</b>, submit to the <b>ISO</b>:</p> <ul style="list-style-type: none"> <li>(a) the dates, times, durations and impact to MW capability for the <b>delayed forced outage</b>;</li> <li>(b) the specific nature of the <b>delayed forced outage</b> work to be done; and</li> <li>(c) a designation of the <b>delayed forced outage</b> as “Derate-Forced” or “Outage-Forced”.</li> </ul>	
4	(2)	<p>A <b>pool participant</b> must also, as soon as reasonably practicable, in respect of a <b>delayed forced outage</b> for which the <b>pool participant</b> has less than 24 hours between the time of discovering the circumstances requiring the <b>delayed forced outage</b> and the time of commencing the <b>delayed forced outage</b>, contact the <b>ISO</b> by telephone, on a telephone number that the <b>ISO</b> designates, which must contain a voice recording system.</p>	
		<p><b>Automatic Forced Outage Notification Requirements</b></p>	
5		<p>A <b>pool participant</b> must, as soon as reasonably practicable, submit <b>automatic forced outage</b> information as follows:</p> <ul style="list-style-type: none"> <li>(a) through contacting the <b>ISO</b> by telephone, on a telephone number that the <b>ISO</b> designates, which must contain a voice recording system; and</li> <li>(b) submit a designation of the <b>automatic forced outage</b> as “Derate-Forced” or “Outage-Forced”.</li> </ul>	

**Please provide your comments on the following (as set out in AUC Rule 017 s. 13(b-j)):**

Item #		Stakeholder comments
1	whether you agree that amended ISO rule – Section 306.5, <i>Generation Outage Reporting</i> relates to the capacity market and why or why not	
2	whether you agree that amended ISO rule – Section 306.5, <i>Generation Outage Reporting</i> should [or should not] be in effect for a fixed term and why or why not	
3	whether you understand and agree Section 306.5, <i>Generation Outage Reporting</i> and whether, in your view, Section 306.5, <i>Generation Outage Reporting</i> meets the objective or purpose	
4	how, in your view, amended ISO rule – Section 306.5, <i>Generation Outage Reporting</i> affects the performance of the capacity market and the electricity market	
5	your views on any analysis conducted or commissioned by the AESO supporting amended ISO rule – Section 306.5, <i>Generation Outage Reporting</i>	
6	whether you agree with amended ISO rule – Section 306.5, <i>Generation Outage Reporting</i> taken together with all ISO rules and in light of the principle of a fair, efficient and openly competitive market	
7	whether you would suggest any alternatives to amended ISO rule – Section 306.5, <i>Generation Outage Reporting</i>	

Item #		Stakeholder comments
8	whether you agree that the proposed provisional rule supports ensuring a reliable supply of electricity at a reasonable cost to customers and why or why not	
9	whether you agree that the proposed provisional rule supports the public interest and why or why not	

***Please provide your views on the type of content that should be included in an information document associated with amended ISO rule – Section 306.5, Generation Outage Reporting.***

Empty response box for stakeholder comments.

