

Proposed New ISO rule – Section 201.13 – Capacity Market Clearing

Period of Comment:	August 13, 2018	through	August 31, 2018	Contact:	Nola Ruzycki / Doug Simpson
Comments From:	Utilities Consumer Advocate			Phone:	403-476-4998 / 403-476-4999
Date [yyyy/mm/dd]:	2018/08/31			Email:	Nola.ruzycki@gov.ab.ca / douglas.simpson@gov.ab.ca

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
		Applicability	
1		Section 201.13 applies to: (a) the ISO .	
		Requirements Auction Clearing	
2	(1)	The ISO must use a clearing process that clears offers and bids , as applicable, in a manner that maximizes social surplus with consideration of the following: (a) a lower priced capacity block in an offer will be cleared before a higher priced capacity block in an offer ; (b) a higher priced capacity block in a bid will be cleared before a lower priced capacity block in a bid ; (c) when multiple equivalent flexible blocks are submitted at the clearing price and result in the same social surplus, clear such equivalent flexible blocks on a pro-rata	

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		<p>basis; and</p> <p>(d) when multiple equivalent inflexible blocks are submitted at the clearing price and result in the same social surplus, clear such equivalent inflexible blocks on a random basis.</p>	
2	(2)	The ISO may perform the clearing process more than once prior to establishing the clearing price.	
		Transfer Path Limits Calculation	
3		<p>The ISO must determine the limits, for each base auction or rebalancing auction, on each of the British Columbia transfer path, Montana transfer path, the Saskatchewan transfer path, and the combined British Columbia and Montana transfer paths by averaging the hourly limits for each of the above as follows:</p> <p>(a) for the British Columbia transfer path, for each of the 250 tightest supply cushion hours per year for the previous 5 years to the base auction or rebalancing auction, as applicable, by assigning a hourly limit based on the minimum of:</p> <ul style="list-style-type: none"> (i) the hourly import available transfer capability for the British Columbia transfer path; or (ii) the long-term firm transmission service on the British Columbia transfer path. <p>(b) for the Montana transfer path, for each of the 250 tightest supply cushion hours per year for the previous 5 years to the base auction or rebalancing auction, as applicable, by assigning a hourly limit based on the minimum of:</p> <ul style="list-style-type: none"> (i) the hourly import available transfer capability for the Montana transfer path; or 	

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		<p>(ii) the long-term firm transmission service on the Montana transfer path.</p> <p>(c) for the Saskatchewan transfer path, for each of the 250 tightest supply cushion hours per year for the previous 5 years to the base auction or rebalancing auction, as applicable, by assigning a hourly limit based on the minimum of:</p> <p>(i) the hourly import available transfer capability for the Saskatchewan transfer path; or</p> <p>(ii) the long-term firm transmission service on the Saskatchewan transfer path.</p> <p>(d) for the combined British Columbia and Montana transfer paths, for each of the 250 tightest supply cushion hours per year for the previous 5 years to the base auction or rebalancing auction, as applicable, by assigning a hourly limit based on the minimum of:</p> <p>(i) the combined import available transfer capability for the British Columbia and Montana transfer paths prior to LSSi arming; or</p> <p>(ii) combined long-term firm transmission for the British Columbia and Montana transfer paths.</p>	
		<p>Consideration of Transmission Congestion Constraints and Transfer Path Limits in Clearing Process</p>	
4	(1)	<p>The ISO may, in the event that the ISO determines that the energy associated with an offer may be unable to be delivered to the interconnected electric system during the obligation period due to either a transmission congestion constraint or a limit on an Alberta intertie determined in accordance with subsection 3:</p>	<p>The UCA has concerns that inflexible blocks could be randomly cleared without regard to cost considerations, given that uplift payments must be paid should there be a difference between the offer price and the clearing price as per 4(3). The ISO rules could be worded such that random, inflexible blocks should be cleared at the lowest cost to minimize uplift payments.</p>

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		<ul style="list-style-type: none"> (a) not clear the offer; (b) clear a portion of the offer; or (c) if there are multiple flexible blocks impacted by the same transmission congestion constraint or limit on an Alberta intertie either: <ul style="list-style-type: none"> (i) not clear the flexible blocks; or (ii) when multiple equivalent flexible blocks are submitted at the same price and result in the same social surplus, clear such equivalent flexible blocks on a pro-rata basis. (d) if there are multiple inflexible blocks impacted by the same transmission congestion constraint or limit on an Alberta intertie either: <ul style="list-style-type: none"> (i) not clear the inflexible blocks; or (ii) when multiple equivalent inflexible blocks are submitted at the same price and result in the same social surplus, clear such equivalent inflexible blocks on a random basis. 	
4	(2)	The ISO may clear additional offers for the equivalent volume of the offers it did not clear pursuant to subsection 4(1).	
4	(3)	The ISO must, for the additional offers cleared in accordance with subsection 4(2), provide an uplift payment for the difference between the offer price and the clearing price, if the offer price of such offers is higher than the clearing price.	

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 201.13 – <i>Capacity Market Clearing</i> relates to the capacity market and why or why not	
2	whether you agree that the proposed new ISO rule – Section 201.13 – <i>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 the proposed new ISO rule – Section 201.13 – <i>Capacity Market Clearing</i> and whether, in your view, the proposed new ISO rule – Section 201.13 – <i>Capacity Market Clearing</i> meets the objective or purpose	
4	how, in your view, the proposed new ISO rule – Section 201.13 – <i>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 the proposed new ISO rule – Section 201.13 – <i>Capacity Market Clearing</i>	
6	whether you agree with the proposed new ISO rule – Section 201.13 – <i>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 the proposed new ISO rule – Section 201.13 – <i>Capacity Market Clearing</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	

Item #		Stakeholder comments
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 201.13 – Capacity Market Clearing

Proposed Amended ISO rule – Section 301.2 ISO Directives

Period of Comment:	August 13, 2018	through	August 31, 2018	Contact:	Nola Ruzycki / Doug Simpson
Comments From:	Utilities Consumer Advocate			Phone:	403-476-4998 / 403-476-4999
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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
		Directives the ISO Issues	
2	(1)	<p>The ISO may issue a directive to an electricity market participant, including a directive to:</p> <ul style="list-style-type: none"> (a) increase or decrease the real power or reactive power output, or both of them, from a facility; (b) increase or decrease the real power consumption at a load asset; (c) shut down or start up a facility; and (d) switch transmission system elements, alter planned outage or maintenance schedules, or load shed. 	<p>“Load asset” should be defined. The UCA strongly opposes the ISO in directing electricity demand from residential, farm or small business consumers. While it is probably not the intent to direct these entities, it should be clarified who the ISO is intending to direct.</p>
		Acknowledging Directives	
		<p>An electricity market participant must acknowledge receipt of a directive:</p> <ul style="list-style-type: none"> (a) in the case of an automated message and unless the electricity market 	

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		<p>participant has notified the ISO of an unavailability in accordance with subsection 4(1) by responding via the Automated Dispatch and Messaging System within 2 minutes; and</p> <p>(b) in the case of a voice directive, by repeating the directive to the ISO.</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 301.2 <i>ISO Directives</i> relates to the capacity market and why or why not	
2	whether you agree that amended ISO rule – Section 301.2 <i>ISO Directives</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 301.2 <i>ISO Directives</i> and whether, in your view, Section 301.2 <i>ISO Directives</i> meets the objective or purpose	
4	how, in your view, amended ISO rule – Section 301.2 <i>ISO Directives</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 301.2 <i>ISO Directives</i>	
6	whether you agree with amended ISO rule – Section 301.2 <i>ISO Directives</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 301.2 <i>ISO Directives</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 301.2 ISO Directives

Proposed Amended ISO rule – Section 303.1 *Load Shed Service*

Period of Comment:	August 13, 2018	through	August 31, 2018	Contact:	Nola Ruzycki / Doug Simpson
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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
		Determining Amount to Arm	
3	(3)	The ISO must set the load shed service arming level at the beginning of the scheduling hour but may modify it if the requirement changes during the scheduling hour.	

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 303.1 <i>Load Shed Service</i> relates to the capacity market and why or why not	
2	whether you agree that amended ISO rule – Section 303.1 <i>Load Shed Service</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 303.1 <i>Load Shed Service</i> and whether, in your view, Section 303.1 <i>Load Shed Service</i> meets the objective or purpose	
4	how, in your view, amended ISO rule – Section 303.1 <i>Load Shed Service</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 303.1 <i>Load Shed Service</i>	
6	whether you agree with amended ISO rule – Section 303.1 <i>Load Shed Service</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 303.1 <i>Load Shed Service</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	It is unconventional to use “MWs” in formal writing. The UCA suggests the following: The electricity market participant must not use the MW reduction from providing load shed service as a means to simultaneously increase ancillary services availability under any other section of the ISO rules or under any contract.

Please provide your views on the type of content that should be included in an information document associated with amended ISO rule – Section 303.1 Load Shed Service

Empty response box for stakeholder comments.

Proposed Amended ISO rule – Section 305.1 *Energy Emergency Alerts*

Period of Comment:	August 13, 2018	through	August 31, 2018	Contact:	Nola Ruzycki / Doug Simpson
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Date [yyyy/mm/dd]:	2018/08/31			Email:	Nola.ruzycki@gov.ab.ca / douglas.simpson@gov.ab.ca

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
		Issuing Energy Emergency Alerts	
2	(1)	The ISO must, during a supply shortfall event, declare an energy emergency alert.	The UCA does not support the changes being proposed. The ISO will issue an alert during a supply shortfall event but “supply shortfall event” is not a defined term so no one outside the AESO will know what the state of supply is when the alert is declared and when the alert is lifted. Removing the level of alerts reduces visibility and clarity for market participants which the UCA does not favour.
2	(2)	The ISO must, when a supply shortfall event ends, cancel the energy emergency alert 0.	The UCA would benefit to understand when an EEA0 is declared. The UCA would like an explanation of why an EEA0 is cancelled rather than having EEA0 declared.

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 305.1 <i>Energy Emergency Alerts</i> relates to the capacity market and why or why not	The UCA questions whether capacity market participants should be included as well since they are measured on their performance during energy emergency events.
2	whether you agree that amended ISO rule – Section 305.1 <i>Energy Emergency Alerts</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 305.1 <i>Energy Emergency Alerts</i> and whether, in your view, Section 305.1 <i>Energy Emergency Alerts</i> meets the objective or purpose	
4	how, in your view, amended ISO rule – Section 305.1 <i>Energy Emergency Alerts</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 305.1 <i>Energy Emergency Alerts</i>	
6	whether you agree with amended ISO rule – Section 305.1 <i>Energy Emergency Alerts</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 305.1 <i>Energy Emergency Alerts</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 305.1 Energy Emergency Alerts

Stakeholder Comment Matrix – August 13, 2018



Proposed Amended ISO rules: *Section 305.4 System Security;*
Section 501.10 Transmission Loss Factors
Section 502.9 Synchrophasor Measurement Unit Technical Requirements
Section 507.1 Open Access Requirement for Proposed Interties

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Date [yyyy/mm/dd]:	2018/08/31			Email:	Nola.ruzycki@gov.ab.ca Douglas.simpson@gov.ab.ca

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.

Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
<p>The AESO is seeking comments from Stakeholders on the development of the following proposed amended ISO rules:</p> <ul style="list-style-type: none"> i. <i>Section 305.4 System Security</i> ii. <i>Section 501.10 Transmission Loss Factors</i> iii. <i>Section 502.9 Synchrophasor Measurement Unit Technical Requirements</i> iv. <i>Section 507.1 Open Access Requirement for Proposed Interties</i> <p>with regard to the following matters:</p>	
<p>1. Do you agree or disagree with the proposed amended ISO rules - <i>Section 305.4 System Security</i>, <i>Section 501.10 Transmission Loss Factors</i>, <i>Section 502.9 Synchrophasor Measurement Unit Technical Requirements</i>, and <i>Section 507.1 Open Access Requirement for Proposed Interties</i>? If you disagree, please provide comments.</p>	

Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
2. Are there any subsections where the language does not clearly articulate the requirement for either the AESO or a market participant? If yes, please indicate the subsections and suggest language that would improve the clarity.	
3. Do you have any additional 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 rules - Section 305.4 <i>System Security</i> , Section 501.10 <i>Transmission Loss Factors</i> , Section 502.9 <i>Synchrophasor Measurement Unit Technical Requirements</i> , and Section 507.1 <i>Open Access Requirement for Proposed Interties</i> relates to the capacity market and why or why not	
2	whether you agree that amended ISO rules – Section 305.4 <i>System Security</i> , Section 501.10 <i>Transmission Loss Factors</i> , Section 502.9 <i>Synchrophasor Measurement Unit Technical Requirements</i> , and Section 507.1 <i>Open Access Requirement for Proposed Interties</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 305.4 <i>System Security</i> , Section 501.10 <i>Transmission Loss Factors</i> , Section 502.9 <i>Synchrophasor Measurement Unit Technical Requirements</i> , and Section 507.1 <i>Open Access Requirement for Proposed Interties</i> and whether, in your view, these amended ISO rules meets the objective or purpose	

Item #		Stakeholder comments
4	<p>how, in your view, amended ISO rule – Section 305.4 <i>System Security</i>, Section 501.10 <i>Transmission Loss Factors</i>, Section 502.9 <i>Synchrophasor Measurement Unit Technical Requirements</i>, and Section 507.1 <i>Open Access Requirement for Proposed Interties</i> affects the performance of the capacity market and the electricity market</p>	
5	<p>your views on any analysis conducted or commissioned by the AESO supporting amended ISO rule – Section 305.4 <i>System Security</i>, Section 501.10 <i>Transmission Loss Factors</i>, Section 502.9 <i>Synchrophasor Measurement Unit Technical Requirements</i>, and Section 507.1 <i>Open Access Requirement for Proposed Interties</i></p>	
6	<p>whether you agree with amended ISO rule – Section 305.4 <i>System Security</i>, Section 501.10 <i>Transmission Loss Factors</i>, Section 502.9 <i>Synchrophasor Measurement Unit Technical Requirements</i>, and Section 507.1 <i>Open Access Requirement for Proposed Interties</i> taken together with all ISO rules and in light of the principle of a fair, efficient and openly competitive market</p>	
7	<p>whether you would suggest any alternatives to amended ISO rule – Section 305.4 <i>System Security</i>, Section 501.10 <i>Transmission Loss Factors</i>, Section 502.9 <i>Synchrophasor Measurement Unit Technical Requirements</i>, and Section 507.1 <i>Open Access Requirement for Proposed Interties</i></p>	
8	<p>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</p>	

Item #		Stakeholder comments
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 information documents associated with amended ISO rules – Section 305.4 System Security, Section 501.10 Transmission Loss Factors, Section 502.9 Synchrophasor Measurement Unit Technical Requirements, or Section 507.1 Open Access Requirement for Proposed Inerties

305.4 System Security:

1 Applicability –why wouldn't this rule apply to all participants and not just electricity market participants? Capacity market participants will be impacted by the actions described in the rule. Further 2(6) refers to "pool participants". Does this include capacity market participants and should they be mentioned in the Applicability section?