Period of Comment:	May 25, 2021	through	May 25, 2021	**Contact:**	Nicole Black
Comments From:	Direct Energy			**Phone:**	403-463-3520
Date:	2021/05/25			**Email**:	nicole.black@directenergy.com

Instructions:

1. Please fill out the section above as indicated.
2. Email your completed comment matrix to rules_comments@aeso.ca.

The AESO is seeking comments from Stakeholders in regards to the following matters:

	Question	Stakeholder Comments
1.	Please comment on Session #2 hosted on April 29, 2021. Was the session valuable? Was there something the AESO could have done to make the session more helpful?	Yes, the session was valuable. The AESO could have limited some of the speaker's input, as certain parties dominated the conversation. The session would have been enhanced with more representation from load serving entities.
2.	Do you have any feedback on the "transmission access" issues identified by the AESO?	Existing generators should not be able to monopolize transmission access. New generation should be able to connect if a long-term return commitment to the market is not possible from legacy assets that have taken an outage. Avoiding the overbuild of the system is the key for all participants, given the growing costs of transmission.
3.	Are there any "transmission access" alternatives the AESO did not identify that would be effective in resolving the issues raised? If yes, please provide a detailed description of the solution and how it addresses the issues.	#4 should be considered which would impose a more stringent set of rules on the large generators that would lead to the elimination of the "free optionality" that is currently enjoyed by the dominant generators.
4.	Do you have a preference for a transmission access alternative? Do you believe any of the alternatives should be removed from consideration? Please explain, taking into consideration the key principles of open competition, cost causation, fairness and stability, outlined in the April 29, 2021 presentation.	Direct Energy has a preference for Alternative #3. The outages have to be tighter given the current market conditions where dominant parties control most of the generation.

	Question	Stakeholder Comments
5.	Are you supportive of the AESO's recommendation to maintain the existing 24-month maximum duration? Please explain.	Yes, an outage beyond 24 months should initiate a shut down or conversion of the asset. Any application for extension should be made public immediately for the sake of transparency. All application should be immediately public on the AESO website.
6.	Do you agree with the current ISO rule requiring the return to service for 3 months before taking a subsequent mothball outage? Or, if the time between mothball outages is extended, what is an appropriate timeline? Please explain.	A "return to service" should be extended to at least two years in order to signal a continuing and significance commitment to the market.
7.	Do you have any additional feedback on the interdependencies between transmission access, maximum duration, and subsequent outages? Please explain.	Equitable and efficient access to the grid should be the goal. Short-term "returns to service" prevent other generators from accessing the grid without providing any long-term benefit to the grid. A philosophy or "use it or lose it" should be implemented with no free options for any market participants.
8.	Are you supportive of the AESO's recommendation to align market participant outage cancellation notification with the declared return to service timelines? Please explain.	A 2 year commitment to the market should be required. Notice should be at least equal to the return to service timeline.
9.	The AESO is considering shortening the minimum outage cancellation notification timeline. Please provide a recommended minimum timeline that allows for the flexibility needed to make business decisions. Note, the AESO requires a minimum of 30 days-notice.	Ability to trade around insider knowledge leads to some ability to manipulate the market. There is a dramatic Impact to the financial market when companies expect supply "x" and are surprised by a sudden shift to supply "y". The AESO should consider how the mothball rules can be exploited by the dominant parties. For example, a large generator can take an outage, which leads to price increases due to lower supply and hedge at this level, and then come back online unexpectedly, which increases supply and moves the forward curve lower.

	Question	Stakeholder Comments
10.	Are you supportive of the AESO's recommendation to maintain the existing 3-month notification requirement with the ability to request a waiver for taking a mothball outage? Please explain.	Direct Energy is opposed to any "waivers". Any outage information should be made immediately public. Traders from large generators should be blocked from trading for a week, while they are in possession of insider "supply" knowledge.
11.	Are you supportive of the AESO's proposal for separate mothball outage reporting? Please explain.	Transparency is key for a FEOC market – detailed reporting is beneficial to all participants to level the playing field by providing greater visibility into the outage reporting, especially any changes to outages.
12.	Are you supportive of maintaining the 36-hour maximum start-up time for long lead time assets and a proposed modification to the rule to apply a maximum start-up time to long lead time type 2 assets? Please explain.	A list of LLT assets should be provided on the AESO website. 36 hours seems like a reasonable start-up time for LLT assets.
13.	Do you have any additional comments?	Input beyond that of generators should be sought out by the AESO. Direct Energy, as an entity that represents load, should be given weight as it brings a disparate, but important view to the issues under consideration. "Free options" should not be available to any market participants and the mothball rules should enhance the FEOC operation of the market.