

December 22, 2022

To: The Market Surveillance Administrator, market participants and other interested parties
("Stakeholders")

Re: **Stakeholder Comments on Letter of Notice of Final Draft Amendments to ISO rules and Definitions to Enable Energy Storage ("Energy Storage ISO Rule Amendments") – Final Proposed Energy Storage Definitions**

Pursuant to Alberta Utilities Commission Rule 017, *Procedures and Process for Development of ISO Rules and Filing of ISO Rules with the Alberta Utilities Commission*, written comments received from the Stakeholders in response to the Alberta Electric System Operator's ("AESO") November 22, 2022 Letter of Notice regarding the Energy Storage ISO Rule Amendments – Final Proposed Energy Storage Definitions have been posted on the AESO website.

Comments were received from the following Stakeholders:

1. AltaLink;
2. Capital Power;
3. Enfinite;
4. ENMAX Corporation; and
5. TransAlta Corporation.

Thank you to all Stakeholders who participated in this ISO rules comment process. All written comments received will be considered in the AESO's finalization of the Energy Storage ISO Rule Amendments and responses to those comments will be posted on the AESO website.

If you have any questions, please submit them to rules_comments@aeso.ca

Sincerely,

Jackie Gow

Legal Manager, ISO Rules and Alberta Reliability Standards
Legal and Regulatory Affairs
rules_comments@aeso.ca

Period of Comment: November 22, 2022 through December 19, 2022 Comments From: AltaLink Date: December 16, 2022	Contact: Jenette Yearsley Phone: (403) 703-3201 Email: Jenette.Yearsley@AltaLink.ca
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Instructions:

1. Please fill out the section above as indicated.
2. Please use the table below to comment on, or raise any concerns with, the final draft energy storage definitions. This includes comments on the following:
 - a. The substantive or administrative changes within the definition;
 - b. Any issues related to how a proposed amended or new definition works within the ISO rules; and
 - c. Any content that should be included in a related information document.
3. Blank boxes will be interpreted as favourable comments.

	Definitions Revised since May 9, 2022 Letter of Notice (including removed and added)	Stakeholder Comments
1.	"allowable dispatch variance" <ul style="list-style-type: none"> • "controllable" • "non-controllable" • "partially-controllable" • "variable energy resource quantity" 	As all forms of energy supply and/or consumption can be curtailed, AltaLink suggests the AESO reconsider the definition of "non-controllable" pool asset to be those assets which are not able to "increase energy production or consumption" and remove the reference to "decrease energy production or consumption" from the definition.
2.	"automatic generation control"	No comments.
3.	"automatic voltage regulator"	No comments.

	Definitions Revised since May 9, 2022 Letter of Notice (including removed and added)	Stakeholder Comments
4.	"black start capability"	No comments.
5.	"bulk transmission line"	No comments.
6.	"electric distribution system"	Refer to the comments below about the AESO's definition of "transmission facility".

	Definitions Revised since May 9, 2022 Letter of Notice (including removed and added)	Stakeholder Comments
7.	“energy storage resource”	<p>Energy Storage Resource is a defined term in the <i>Electricity Statutes Amendment Act (ESAA)</i>. The AESO uses the same term; however, it applies a different definition. AltaLink understands the AESO’s rationale for this alternate definition of “energy storage resource” to be because the proposed storage rule is meant to apply only to energy storage resources that participate in the electricity markets and not to energy storage resources owned by a DFO or TFO as allowed under the <i>ESAA</i>.</p> <p>Although AltaLink understands and agrees with the need to create a market energy storage resource definition, it disagrees with the definition proposed. First, applying a different definition to the exact term already defined in the legislation causes confusion and potentially disputes. Second, it is unclear to AltaLink whether the additional reference to “approved by the Commission pursuant to section 13.01 of the HEEA” would be enough to differentiate market energy storage resources from those owned by TFOs and DFOs. For example, at this point, it seems likely that the Commission could approve a TFO’s storage facility under section 13.01 as well as under section 14 and 15 of HEEA. Section 13.01(b) states that the Commission may make rules with respect to the procedures and processes applicable to locating, building, constructing and operating an energy storage facility. The definition energy storage facility in the <i>ESAA</i> is broad enough to cover market as well as DFO and TFO storage. AltaLink would expect that any TFO building a storage facility would need to consider, and follow where applicable, the Commission’s rules on storage facilities.</p> <p>AltaLink suggests that the AESO create a specific definition for “market energy storage resource” that excludes energy storage resources owned by a TFO or DFO as allowed under the <i>ESAA</i> and the <i>Electric Utilities Act (EUA)</i> as opposed to using a definition already used in legislation.</p>
8.	"generating asset steady state"	No comments.
9.	“gross real power”	No comments.

	Definitions Revised since May 9, 2022 Letter of Notice (including removed and added)	Stakeholder Comments
10.	“in merit”	No comments.
11.	"incremental generation costs"	No comments.
12.	"loss factor"	No comments.
13.	"maximum authorized charging power"	No comments.
14.	"maximum authorized real power"	No comments.
15.	“transmission facility”	AltaLink has the same concern as discussed above for “energy storage resource”. The term “transmission facility” is defined in the <i>EUA</i> and the <i>ESAA</i> . The AESO’s uses the same term but proposes a different definition which again causes confusion. AltaLink believes its proposed addition of a “market energy storage resource” would allow the AESO to target its rule to market storage (not DFO or TFO storage) without adding confusion.

	Definitions with no further revisions since May 9, 2022 Letter of Notice	Stakeholder Comments
16.	"acceptable operational reason"	No comments.

	Definitions with no further revisions since May 9, 2022 Letter of Notice	Stakeholder Comments
17.	"aggregated facility"	No comments.
18.	"Alberta internal load"	No comments.
19.	"available capability"	No comments.
20.	"collector bus"	No comments.
21.	"commercial operation"	No comments.
22.	"commissioning"	No comments.
23.	"control centre"	No comments.
24.	"electrical islands"	No comments.
25.	"generating unit"	No comments.

	Definitions with no further revisions since May 9, 2022 Letter of Notice	Stakeholder Comments
26.	"governor or governor system"	No comments.
27.	"legal owner"	No comments.
28.	"long lead time asset"	No comments.
29.	"market participant"	No comments.
30.	"maximum capability"	No comments.
31.	"operational deviation"	No comments.
32.	"operator"	No comments.
33.	"point of connection"	No comments.
34.	"point of supply"	No comments.

	Definitions with no further revisions since May 9, 2022 Letter of Notice	Stakeholder Comments
35.	"pool asset"	No comments.
36.	"ramping"	No comments.
37.	"sink asset"	No comments.
38.	"source asset"	No comments.
39.	"transmission must-run"	No comments.

<p>Period of Comment: November 22, 2022 through December 19, 2022</p> <p>Comments From: Capital Power</p> <p>Date: 2022/12/19</p>	<p>Contact: Megan Gill</p> <p>Phone: 403.827.3566</p> <p>Email: mgill@capitalpower.com</p>
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 - a. The substantive or administrative changes within the definition;
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3. Blank boxes will be interpreted as favourable comments.

	Definitions Revised since May 9, 2022 Letter of Notice (including removed and added)	Stakeholder Comments
1.	<p>"allowable dispatch variance"</p> <ul style="list-style-type: none"> • "controllable" • "non-controllable" • "partially-controllable" • "variable energy resource quantity" 	<p>Capital Power supports the "technology-agnostic ADV" definition, however makes one observation and requests the following clarifications:</p> <ul style="list-style-type: none"> - Observation: the "technology-specific ADV" definition is not truly technology agnostic, as the definition of "non-controllable" is based on technology types. That said, Capital Power is unable to offer any suggestions to make the proposed definition <i>more</i> technology agnostic, as this may create unintended consequences for hydro, geothermal and other resources. - Recommendation 1: remove the "or" and the second "(v)" defining ADV when the asset is dispatched outside the VER block should be labelled as "(vi)" for clarity sake when rules are quoted. - Recommendation 2: Proposed requirements for "non-controllable" may create confusion. The AESO notes in its description that "if a source asset is non-controllable, by definition, the dispatch compliance is based on meteorological conditions". However this is not clear in the proposed requirements for non-controllable assets under the ADV definition.

	Definitions Revised since May 9, 2022 Letter of Notice (including removed and added)	Stakeholder Comments
2.	"automatic generation control"	Capital Power has no comment at this time.
3.	"automatic voltage regulator"	Capital Power has no comment at this time.
4.	"black start capability"	Capital Power has no comment at this time.
5.	"bulk transmission line"	Capital Power has no comment at this time.
6.	"electric distribution system"	Capital Power has no comment at this time.
7.	"energy storage resource"	Capital Power has no comment at this time.
8.	"generating asset steady state"	Capital Power has no comment at this time.

	Definitions Revised since May 9, 2022 Letter of Notice (including removed and added)	Stakeholder Comments
9.	“gross real power”	<p>Capital Power recommends that the definition should explicitly state where gross real power would be measured for ES resources.</p> <p>Capital Power offers two suggestions to further clarify that the gross real power from an aggregated facility, which includes an energy storage resource, will be considered as the combined gross real power output from both the generating unit(s) and the energy storage resource(s):</p> <ul style="list-style-type: none"> - Suggestion 1: Should “and/or” replace the first “or”? - Suggestion 2: Should the order of the roman numerals, such that “the real power measurement at the generator terminal” appear as first?
10.	“in merit”	Capital Power has no comment at this time.
11.	"incremental generation costs"	Capital Power has no comment at this time.
12.	"loss factor"	Capital Power has no comment at this time.
13.	"maximum authorized charging power"	Capital Power has no comment at this time.
14.	"maximum authorized real power"	Capital Power has no comment at this time.
15.	“transmission facility”	Capital Power has no comment at this time.

	Definitions with no further revisions since May 9, 2022 Letter of Notice	Stakeholder Comments
16.	"acceptable operational reason"	Capital Power has no comment at this time.
17.	"aggregated facility"	Capital Power remains of the view that the AESO should provide more detail in the definition of an aggregated facility to clarify requirements and eligibility for a waiver & variance as an interim solution to accommodate resources greater than 9 MW. This would provide more clarity and certainty for market participants.
18.	"Alberta internal load"	Capital Power has no comment at this time.
19.	"available capability"	Capital Power has no comment at this time.
20.	"collector bus"	Capital Power has no comment at this time.
21.	"commercial operation"	Capital Power has no comment at this time.
22.	"commissioning"	Capital Power has no comment at this time.
23.	"control centre"	Capital Power notes that the concerns we expressed in the last round of feedback have not been addressed in the proposed definition. In our view, the term "operating personnel" should be defined to make it clear that it excludes a dispatching center that simply relays operating instructions (and does not make decisions on operating instructions). The term "reliability tasks" should also be clearly defined in this same regard. This is important to ensure market participants have clarity and certainty around the rules to mitigate compliance risk.

	Definitions with no further revisions since May 9, 2022 Letter of Notice	Stakeholder Comments
24.	"electrical islands"	Capital Power has no comment at this time.
25.	"generating unit"	Capital Power has no comment at this time.
26.	"governor or governor system"	Capital Power has no comment at this time.
27.	"legal owner"	Capital Power has no comment at this time.
28.	"long lead time asset"	Capital Power has no comment at this time.
29.	"market participant"	Capital Power has no comment at this time.
30.	"maximum capability"	Capital Power has no comment at this time.
31.	"operational deviation"	Capital Power has no comment at this time.
32.	"operator"	Capital Power has no comment at this time.

	Definitions with no further revisions since May 9, 2022 Letter of Notice	Stakeholder Comments
33.	"point of connection"	Capital Power has no comment at this time.
34.	"point of supply"	Capital Power has no comment at this time.
35.	"pool asset"	Given the multiple overlapping definitions, the AESO may want to consider creating a Venn diagram or something similar that visually depicts the nesting, and/or overlap, of defined resources. This may save time and add clarity in the long-run.
36.	"ramping"	Capital Power has no comment at this time.
37.	"sink asset"	Capital Power has no comment at this time.
38.	"source asset"	Capital Power has no comment at this time.
39.	"transmission must-run"	Capital Power has no comment at this time.

Other Comments:

Capital Power was supportive of the AESO including a new definition for Fast Frequency Response Service and would like more information about the AESO's plan to accelerate work associated with addressing frequency-related matters now that it is proposing to remove the proposed definition.

Period of Comment: November 22, 2022 through December 19, 2022 Comments From: Enfinite Date: 2022/12/19	Contact: Mike Schoenenberger Phone: 587-315-7444 Email: mschoenenberger@enfinite.com
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	Definitions Revised since May 9, 2022 Letter of Notice (including removed and added)	Stakeholder Comments
1.	"allowable dispatch variance" <ul style="list-style-type: none"> • "controllable" • "non-controllable" • "partially-controllable" • "variable energy resource quantity" 	<i>No comment</i>
2.	"automatic generation control"	<i>No comment</i>
3.	"automatic voltage regulator"	<i>No comment</i>

	Definitions Revised since May 9, 2022 Letter of Notice (including removed and added)	Stakeholder Comments
4.	"black start capability"	<i>No comment</i>
5.	"bulk transmission line"	<i>No comment. The final draft is our preference.</i>
6.	"electric distribution system"	<i>No comment. The final draft is our preference.</i>
7.	"energy storage resource"	<i>No comment</i>
8.	"generating asset steady state"	<i>No comment</i>
9.	"gross real power"	<i>No comment</i>
10.	"in merit"	<i>No comment</i>
11.	"incremental generation costs"	<i>No comment</i>
12.	"loss factor"	<i>No comment</i>
13.	"maximum authorized charging power"	<i>No comment</i>
14.	"maximum authorized real power"	<i>The definition for energy storage resource needs to be updated as there is typically no stator windings associated. Enfinite recommends using the same definition from the aggregated facility with the measurement at the collector buses.</i>
15.	"transmission facility"	<i>No comment. The final draft is our preference.</i>

	Definitions with no further revisions since May 9, 2022 Letter of Notice	Stakeholder Comments
16.	"acceptable operational reason"	<i>No comment</i>
17.	"aggregated facility"	<i>No comment</i>
18.	"Alberta internal load"	<i>No comment</i>
19.	"available capability"	<i>No comment</i>
20.	"collector bus"	<i>No comment</i>
21.	"commercial operation"	<i>No comment</i>
22.	"commissioning"	<i>No comment</i>
23.	"control centre"	<i>No comment</i>
24.	"electrical islands"	<i>No comment</i>

	Definitions with no further revisions since May 9, 2022 Letter of Notice	Stakeholder Comments
25.	"generating unit"	<i>No comment</i>
26.	"governor or governor system"	<i>No comment</i>
27.	"legal owner"	<i>No comment</i>
28.	"long lead time asset"	<i>No comment</i>
29.	"market participant"	<i>No comment</i>
30.	"maximum capability"	<i>No comment</i>
31.	"operational deviation"	<i>No comment</i>
32.	"operator"	<i>No comment</i>
33.	"point of connection"	<i>No comment</i>

	Definitions with no further revisions since May 9, 2022 Letter of Notice	Stakeholder Comments
34.	"point of supply"	<i>No comment</i>
35.	"pool asset"	<i>No comment</i>
36.	"ramping"	<i>No comment</i>
37.	"sink asset"	<i>No comment</i>
38.	"source asset"	<i>No comment</i>
39.	"transmission must-run"	<i>No comment</i>

Period of Comment: November 22, 2022 through December 19, 2022 Comments From: ENMAX Corporation Date: 2022/12/21	Contact: Randy Stubbings Phone: Email: RStubbings@enmax.com
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3. Blank boxes will be interpreted as favourable comments.

	Definitions Revised since May 9, 2022 Letter of Notice (including removed and added)	Stakeholder Comments
1.	"allowable dispatch variance" <ul style="list-style-type: none"> • "controllable" • "non-controllable" • "partially-controllable" • "variable energy resource quantity" 	<p>There are two section (v)'s here.</p> <p>In the second section (v), the phrase "plus or minus [5 or 10] MW" is used, but the value against which it is measured is not stated.</p>
2.	"automatic generation control"	<p>We suggest the following modification (delete the strikethrough text and add the underlined text): "automatic generation control means equipment that adjusts the <u>process of adjusting</u> resources that produce or consume electrical energy in a balancing authority area, <u>in response to a control signal</u> from a central location, to maintain the balancing authority's frequency or interchange schedule plus or minus frequency bias; and may also or to accommodate automatic inadvertent payback and time error correction." NOTE: the equipment would be an "automatic generation control device" or an "automatic generation controller."</p>

	Definitions Revised since May 9, 2022 Letter of Notice (including removed and added)	Stakeholder Comments
3.	"automatic voltage regulator"	We suggest an addition: "... that adjusts and continuously maintains the voltage level <u>at the point of interconnection of ...</u> "
4.	"black start capability"	No comment
5.	"bulk transmission line"	<p>Is the use of "<u>bulk</u> transmission line" intended to distinguish bulk facilities from regional or local facilities? If so, the definition is circular because it uses the undefined term "bulk."</p> <p>We suggest the following change: "transmission circuits composed of the conductors that form the minimum set required to se transmit electric energy." The reason is that either: (i) transmission circuits can contain <i>more</i> than the minimum set of conductors, in which case such circuits would fall outside the definition; or (ii) the minimum set is, by definition, whatever the line contains, in which case reference to the minimum set is redundant.</p>
6.	"electric distribution system"	No comment
7.	"energy storage resource"	The AESO has deleted the definition of "energy storage facility" but then refers to it, in bold, in its definition of "energy storage resource."
8.	"generating asset steady state"	Assume an asset with a ± 5 MW ADV is redispatched from 100 MW to 150 MW at 13:04:00. At 13:09:50 its output reaches 145.1 MW, which is within the ADV band. At 13:10:10 its output falls to 144.9 MW, which is outside the band. At 13:10:30, it reaches 145.0 MW, and it remains within the ADV band till the next dispatch. In which 10-minute clock period is the asset deemed to have reached the generating asset steady state? See also the definition of "ramping."

	Definitions Revised since May 9, 2022 Letter of Notice (including removed and added)	Stakeholder Comments
9.	“gross real power”	It appears that the locations of the numbers are incorrect. We assume this definition should read: “gross real power” means: (i) for an aggregated facility, the sum of real power delivered at the collector bus; (ii) for a generating unit, the real power measurement at the generator terminal; or (iii) for an energy storage resource, the real power measurement at the low voltage side of the transmission system step-up transformer.
10.	“in merit”	We suggest using “in a bid” instead of “for a bid” to maintain consistency with “in an offer.” Also, “(iii)” should not be struck.
11.	"incremental generation costs"	The wording “in the form of verified damages or liquidated claims dollar amounts or claimed by third parties” is confusing.
12.	"loss factor"	No comment
13.	"maximum authorized charging power"	No comment
14.	"maximum authorized real power"	There are two (ii)'s. The first appears to have been struck in error, while the second should be (iii) and must be corrected, since not all energy storage resources have stator windings.
	“partially controllable”	Add an “s” to the first “resource.”
15.	“transmission facility”	The definition refers to the high voltage terminal of the generation transformer. The definition should be modified to include the step-up transformers for generating units, aggregated facilities, and energy storage resources, and to exclude generating units, aggregated facilities, and energy storage resources. This will provide consistency with the definition of “point of connection.”

	Definitions with no further revisions since May 9, 2022 Letter of Notice	Stakeholder Comments
16.	"acceptable operational reason"	In (i), delete the comma after "asset." In (i)(a), add a comma after "operated" and after the last "asset." In (i)(b), delete the comma after "assets" and delete "due to the need."
17.	"aggregated facility"	Add a comma after "means."
18.	"Alberta internal load"	No comment
19.	"available capability"	No comment
20.	"collector bus"	No comment
21.	"commercial operation"	No comment
22.	"commissioning"	No comment
23.	"control centre"	No comment
24.	"electrical islands"	No comment
25.	"generating unit"	No comment

	Definitions with no further revisions since May 9, 2022 Letter of Notice	Stakeholder Comments
26.	"governor or governor system"	No comment
27.	"legal owner"	No comment
28.	"long lead time asset"	No comment
29.	"market participant"	No comment
30.	"maximum capability"	The definition references the requirement to comply with applicable ISO rules and the terms and conditions of the ISO tariff. Should it also refer to compliance with other government regulations?
31.	"operational deviation"	No comment
32.	"operator"	No comment
33.	"point of connection"	No comment
34.	"point of supply"	Either: "including a generating unit, aggregated facility, or an electric distribution system" or "including a generating unit, an aggregated facility, or an electric distribution system."

	Definitions with no further revisions since May 9, 2022 Letter of Notice	Stakeholder Comments
35.	"pool asset"	No comment
36.	"ramping"	Please see the question raised in connection with "generating asset steady state."
37.	"sink asset"	No comment
38.	"source asset"	No comment
39.	"transmission must-run"	No comment

<p>Period of Comment: November 22, 2022 through December 19, 2022</p> <p>Comments From: TransAlta Corporation</p> <p>Date: 2022/12/19</p>	<p>Contact: Akira Yamamoto</p> <p>Phone: 403-267-7304</p> <p>Email: akira_yamamoto@transalta.com</p>
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1.	<p>"allowable dispatch variance"</p> <ul style="list-style-type: none"> • "controllable" • "non-controllable" • "partially-controllable" • "variable energy resource quantity" 	No comment at this time.
2.	"automatic generation control"	Please clarify automatic generation control applies to loads (other than energy storage resources) that consume electrical energy.
3.	"automatic voltage regulator"	No comment at this time.

	Definitions Revised since May 9, 2022 Letter of Notice (including removed and added)	Stakeholder Comments
4.	"black start capability"	Please clarify the intent of replacing "AIES" with "interconnected electric system". Is the AESO implying that resources outside AIES but interconnected to AIES can supply blackstart capability (e.g., resources in other jurisdictions)?
5.	"bulk transmission line"	No comments at this time.
6.	"electric distribution system"	No comments at this time.
7.	"energy storage resource"	No comments at this time.
8.	"generating asset steady state"	The reference to "energy production" is overly broad and could be interpreted to apply to thermal or other forms of energy. TransAlta recommends that "energy production" be replaced by "electricity production".
9.	"gross real power"	No comments at this time.
10.	"in merit"	No comments at this time.
11.	"incremental generation costs"	No comments at this time.
12.	"loss factor"	No comments at this time.

	Definitions Revised since May 9, 2022 Letter of Notice (including removed and added)	Stakeholder Comments
13.	"maximum authorized charging power"	No comments at this time.
14.	"maximum authorized real power"	No comments at this time.
15.	"transmission facility"	No comments at this time.

	Definitions with no further revisions since May 9, 2022 Letter of Notice	Stakeholder Comments
16.	"acceptable operational reason"	No comments at this time.
17.	"aggregated facility"	No comments at this time.
18.	"Alberta internal load"	No comments at this time.
19.	"available capability"	No comments at this time.
20.	"collector bus"	No comments at this time.

	Definitions with no further revisions since May 9, 2022 Letter of Notice	Stakeholder Comments
21.	"commercial operation"	No comments at this time.
22.	"commissioning"	No comments at this time.
23.	"control centre"	No comments at this time.
24.	"electrical islands"	The proposed language replaces “generation” with “energy production” but the term “energy production” is broader than “electricity production” and would include other energy products including oil, gas, and thermal energy. The AESO should consider replacing the term “energy production” with “electricity production”.
25.	"generating unit"	No comments at this time.
26.	"governor or governor system"	No comments at this time.
27.	"legal owner"	No comments at this time.
28.	"long lead time asset"	No comments at this time.
29.	"market participant"	No comments at this time.

	Definitions with no further revisions since May 9, 2022 Letter of Notice	Stakeholder Comments
30.	"maximum capability"	No comment at this time.
31.	"operational deviation"	<p>TransAlta has no comments with respect to how operational deviations apply to source assets.</p> <p>TransAlta requests the AESO to clarify whether there are operational deviations that apply to sink assets given that the AESO's proposed definition of ramping applies to pool assets including sink assets.</p>
32.	"operator"	No comment at this time.
33.	"point of connection"	No comment at this time.
34.	"point of supply"	No comment at this time.
35.	"pool asset"	No comment at this time.
36.	"ramping"	The proposed definition refers to the allowable dispatch variance for a pool asset; however, there is no definition of how the concept of the allowable dispatch variance is applied to sink assets. TransAlta asks the AESO to clarify how this ramping requirement is applied to sink assets given that the requirement itself has been extends to all pool assets including sink assets.
37.	"sink asset"	No comment at this time.

	Definitions with no further revisions since May 9, 2022 Letter of Notice	Stakeholder Comments
38.	"source asset"	No comment at this time.
39.	"transmission must-run"	No comment at this time.