

March 3, 2023

To: The Market Surveillance Administrator, Market Participants and Other Interested Parties  
("Stakeholders")

**Re: Late Stakeholder Comments on Notice of Administrative Amendments to the ISO Rules in Pursuit of Red Tape Reduction ("Red Tape Administrative Amendments")**

On February 21, 2023 and March 1, 2023 the Alberta Electric System Operator ("AESO") received late written comments on the Red Tape Administrative Amendments.

Comments were received from the following Stakeholders:

1. Morgan Stanley Capital Group Inc.; and
2. TransAlta Corporation.

Thank you to all Stakeholders who participated in this ISO rules comment process.

Sincerely,

*Jackie Gow*

Legal Manager, ISO Rules and Alberta Reliability Standards  
Legal and Regulatory Affairs  
[rules\\_comments@aeso.ca](mailto:rules_comments@aeso.ca)



<p><b>Period of Comment:</b> January 17, 2023 through February 7, 2023</p> <p><b>Comments From:</b> Morgan Stanley Capital Group Inc.</p> <p><b>Date:</b> [2023/03/01]</p>	<p><b>Contact:</b> Jeremy Lamb</p> <p><b>Phone:</b> 604-658-8119</p> <p><b>Email:</b> jeremy.lamb@morganstanley.com</p>
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Instructions:

1. Please fill out the section above as indicated.
2. Please refer back to the “related material” on the Stakeholder Engagement page on the AESO website.
3. Please identify which ISO Rule and section you have comments for (if any) and place your comments/reasons for position in the appropriate column. Unidentified Rules will be interpreted as favourable comments.

Red Tape Administrative Amendments		
Table A: Removes a provision of the ISO Rule because it is no longer required		
ISO Rule	Subsection	Stakeholder Comments
203.6	s. 5(4)	<p>In support of the administrative reduction goal under the Red Tape Reduction process, Morgan Stanley further suggests the AESO <u>remove</u> s. 5(4) from rule 203.6, as its removal harmonizes it consistent with what is being achieved by the the removal of the sections s. 5(3)b and s. 6(4)a already proposed.</p> <p>Under s. 5(4) the AESO requests participants restate:</p> <p>“if due to a determination by the <b>ISO</b> under subsection 10 the amount in MW of the <b>interchange transaction</b> on an individual transfer path exceeds the individual transfer path <b>available transfer capability</b> allocation as determined under that subsection”</p> <p>Restating under this premise is another example of participants communicating back information that originates at the AESO. Removing this section would allow for further red tape administrative gains in efficiency.</p>



Red Tape Administrative Amendments		
Table B: Updates drafting style of the ISO Rule		
ISO Rule	Subsection	Stakeholder Comments

**From:** [Ashley Scheelar](#)  
**To:** [ISO Rules Comment](#)  
**Subject:** Red Tape Administrative Amendments  
**Date:** Tuesday, February 21, 2023 11:23:39 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)

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
Hello

I had a very minor administrative fix regarding the ISO Rules Red Tape:

**Requirements**

**Informal Dispute Resolution**

**2(1)** The first step a **market participant** must take to resolve a dispute with the **ISO** is to make reasonable efforts to informally resolve the dispute with the appropriate representative of the **ISO**.

**(2)** A **market participant** may call the **ISO** main reception telephone number posted on the AESO website if the **market participant** is unsure of the appropriate representative of the **ISO** to contact **about the dispute** 



**Ashley Scheelar** (she/her/elle) | **Senior Advisor, Compliance**  
TransAlta Corporation

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**T:** [+1 \(403\) 267-7916](tel:+14032677916) | **C:** +1 (403) 540-1059

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