

October 30, 2018

To: Market Surveillance Administrator, Market Participants and Other Interested Parties

Re: **Market Participant Comments on Letter of Notice for Development of the Proposed New and Amended ISO Rule:**

- (a) **New Section 502.17 of the ISO Rules, *Voice Communication System Requirements* (“proposed new Section 502.17”); and**
- (b) **Amendments to Section 502.4 of the ISO Rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“proposed amended Section 502.4”)**

collectively referred to as the “new and amended ISO Rules”.

Pursuant to Section 5.2 of 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 market participants in response to the Alberta Electric System Operator’s (“AESO”) October 9, 2018 Letter of Notice for Development of a proposed new and amended ISO Rules have been posted on the AESO website.

The following grid is hyperlinked to provide assistance in directing market participants to these written comments.

New and Amended ISO Rules
AltaLink Management Ltd.
ATCO Electric Ltd.
ENMAX Energy Corporation
EPCOR Distribution & Transmission Inc.
TransAlta Corporation

Thank you to all market participants who participated in this part of the ISO rules comment process. All written comments received will be considered in the AESO’s development of the proposed new and amended ISO Rules.

Sincerely,

Melissa Mitchell-Moisson

Regulatory Coordinator
 Legal & Regulatory Affairs
melissa.mitchell-moisson@aes0.ca
 403-539-2948

Stakeholder Comment Matrix – October 9, 2018



Development of Proposed New and Amended ISO rules

Period of Comment: October 9, 2018 through October 24, 2018	Contact: Jenette Yearsley
Comments From: AltaLink	Phone: 403-387-8275
Date [yyyy/mm/dd]: 2018/10/24	Email: Jenette.Yearsley@AltaLink.ca

The AESO is seeking comments from Stakeholders on the development of proposed new and amended ISO rules with regard to the following matters:

	Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
1.	Do you agree or disagree that the issue identified requires the development of the proposed new and amended ISO rules? Please comment.	AltaLink agrees that the issue identified requires the development of the proposed new and amended ISO rules.
2.	Do you agree or disagree with the potential objective or purpose of the proposed new and amended SO rules? Please comment.	Agree.
3.	Do you agree or disagree with the proposed form of consultation and timelines? Please comment.	Agree.
4.	Do you intend to participate in any related consultation? OR Do you agree that no additional consultation group is required for this rule development? Please comment.	AltaLink has participated in some consultation leading up to this point and has provided input. AltaLink intends to participate in any related consultation and looks forward to seeing the proposed ISO rules.
5.	Do you have any additional comments?	No additional comments.

Stakeholder Comment Matrix – October 9, 2018



Development of Proposed New and Amended ISO rules

Period of Comment: October 9, 2018 through
October 24, 2018

Comments From: ATCO Electric Ltd.

Date [yyyy/mm/dd]: 2018/10/17

Contact: Dan Bamber

Phone: 780 918-0986

Email: Dan.bamber@atco.com

The AESO is seeking comments from Stakeholders on the development of proposed new and amended ISO rules with regard to the following matters:

	Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
1.	Do you agree or disagree that the issue identified requires the development of the proposed new and amended ISO rules? Please comment.	AE agrees that there is enough overlap between COM-001, COM-002 and ISO Rule 502.4 to justify the ISO's development of the proposed the new and amended ISO rules.
2.	Do you agree or disagree with the potential objective or purpose of the proposed new and amended SO rules? Please comment.	ATCO agrees with the objective of the proposed new and amended SO rules.
3.	Do you agree or disagree with the proposed form of consultation and timelines? Please comment.	ATCO agrees with the proposed form of consultation and timelines.
4.	Do you intend to participate in any related consultation? OR Do you agree that no additional consultation group is required for this rule development? Please comment.	ATCO intends to participate in any related consultations. Depends on the type and numbers of market participants that will be impacted, others may be included in the consultation process for the new proposed rule.
5.	Do you have any additional comments?	

Stakeholder Comment Matrix – October 9, 2018



Development of Proposed New and Amended ISO rules

Period of Comment: October 9, 2018 through October 24, 2018	Contact: Mary-Beth Hansen
Comments From: ENMAX Energy Corporation	Phone: 4036890321
Date : 2018/10/24	Email: mhansen@enmax.com

The AESO is seeking comments from Stakeholders on the development of proposed new and amended ISO rules with regard to the following matters:

	Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
1.	Do you agree or disagree that the issue identified requires the development of the proposed new and amended ISO rules? Please comment.	Agree
2.	Do you agree or disagree with the potential objective or purpose of the proposed new and amended SO rules? Please comment.	Agree.
3.	Do you agree or disagree with the proposed form of consultation and timelines? Please comment.	Agree
4.	Do you intend to participate in any related consultation? OR Do you agree that no additional consultation group is required for this rule development? Please comment.	EEC intends to participate and agrees that additional consultation is required for this rule development.
5.	Do you have any additional comments?	

Stakeholder Comment Matrix – October 9, 2018



Development of Proposed New and Amended ISO rules

Period of Comment: October 9, 2018 through October 24, 2018

Comments From: EPCOR Distribution & Transmission Inc. (EDTI)

Date [yyyy/mm/dd]: 2018/10/17

Contact: Travis Robinson

Phone: 780-412-3079

Email: TRobinson@epcor.com

The AESO is seeking comments from Stakeholders on the development of proposed new and amended ISO rules with regard to the following matters:

	Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
1.	Do you agree or disagree that the issue identified requires the development of the proposed new and amended ISO rules? Please comment.	Agree
2.	Do you agree or disagree with the potential objective or purpose of the proposed new and amended SO rules? Please comment.	Agree
3.	Do you agree or disagree with the proposed form of consultation and timelines? Please comment.	It is difficult to comment on the form of consultation and proposed timelines without reviewing the proposed rules and standard.
4.	Do you intend to participate in any related consultation? OR Do you agree that no additional consultation group is required for this rule development? Please comment.	EDTI intends to participate in the consultation for these rules/standards.
5.	Do you have any additional comments?	

Stakeholder Comment Matrix – October 9, 2018



Development of Proposed New and Amended ISO rules

<p>Period of Comment: October 9, 2018 through October 24, 2018</p> <p>Comments From: TransAlta</p> <p>Date [yyyy/mm/dd]: October 24, 2018</p>	<p>Contact: David Michaud</p> <p>Phone: (403) 267-4913</p> <p>Email: David_Michaud@transalta.com</p>
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The AESO is seeking comments from Stakeholders on the development of proposed new and amended ISO rules with regard to the following matters:

Re: Proposed new ISO Rules Section 502.17 and amendment of existing Section 502.4.

	Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
1.	Do you agree or disagree that the issue identified requires the development of the proposed new and amended ISO rules? Please comment.	<i>Given the AESO has identified content overlap in certain authoritative documents and a need to improve the clarity of requirements, TransAlta agrees the amendment and new rule are required.</i>
2.	Do you agree or disagree with the potential objective or purpose of the proposed new and amended SO rules? Please comment.	<i>TransAlta agrees with the objectives/purpose described in the AESO October 9, 2018 Letter of Notice.</i>
3.	Do you agree or disagree with the proposed form of consultation and timelines? Please comment.	<p><i>TransAlta appreciates the AESO having provided an opportunity for TransAlta to participate in consultation as a member of the Telecommunication Workgroup which is part of the Alberta Reliability Committee Discussion Group (ARCDG).</i></p> <p><i>TransAlta requests the AESO include language within new Section 502.17 which would provide the AESO with the authority to grant waivers or variances requested by market participants. Should the AESO not be amendable to inclusion of such language, then we request the AESO form a consultation group and work with market participants to ensure the concern is understood and considered by the AESO and in order for market participants to understand the AESO's rationale.</i></p> <p><i>As context, TransAlta has reviewed a draft of new ISO Rules Section 502.17 which was provided by the AESO to attendees at an April ARCDG meeting. Section 2 of that</i></p>

		<p><i>draft relates to waivers or variances respecting the AESO requiring a market participant to comply with requirements in addition to those of Section 502.17. TransAlta requests the AESO also include a section providing the AESO with the authority to grant waivers or variances requested by market participants. The reason for our request is two-fold. Firstly, parties could potentially not comply with all requirements described in Section 502.17 and could require a mechanism to apply for and receive a variance or waiver from the AESO. Secondly, in response to past market participant requests for variances relating to certain generating unit technical requirements included in Section 502.5, the AESO denied such requests on the basis that an individual ISO Rule must include appropriate authority for the AESO to grant waivers or variances for that specific rule. The April draft of Section 502.17 does not include such authority.</i></p>
4.	<p>Do you intend to participate in any related consultation? OR Do you agree that no additional consultation group is required for this rule development? Please comment.</p>	<p><i>TransAlta does intend to participate in any related consultation which occurs with respect to inclusion of language granting the AESO authority to grant waivers or variances requested by market participants. .</i></p>
5.	<p>Do you have any additional comments?</p>	<p><i>We currently have no further comments.</i></p>