



Red Tape Administrative Amendments			
Table A: Removes a provision of the ISO Rule because it is no longer required			
ISO Rule	Subsection	Stakeholder Comments	AESO Reply
203.6	s. 5(3)(b) s. 6(4)(a) <sup>1</sup>	<p><b><u>Morgan Stanley Capital Group Inc (“Morgan Stanley”)</u></b></p> <p>1. Thank you for providing the opportunity to file comments under the ISO Rules Red Tape Administrative Amendments stakeholder process. Morgan Stanley appreciates the AESO’s efforts on these initiatives.</p> <p>The AESO proposes to revise Section 203.6, Available Transfer Capability and Transfer Path Management such that curtailments issued by the ISO will no longer require an associated restatement in ETS. Morgan Stanley is supportive of this change and views it as a positive step forward for the AESO as well as for any market participant which transacts over the interties.</p> <p>In addition to the proposal, Morgan Stanley requests that AESO also consider an incremental change to the rule that would align with the theme of the current proposal while also adding further efficiencies to market participants. As justification for the section 203.6 change under the current proposal the AESO details:</p> <p>Adding the words “other than” removes an unnecessary requirement for pool participants to restate their available capability for interchange transactions in circumstances where an e-tag is curtailed by the ISO. Restating available capability in this circumstance is unnecessary because the pool participant would be repeating an instruction that was already given by the AESO through the curtailment of the e-tag. See table B for explanation on the additional changes in this provision.</p>	<p>1. The AESO agrees with Morgan Stanley. In light of Morgan Stanley’s further comments (see Stakeholder Comments #2 below), the AESO has addressed these comments by removing sections 5(3)(b) and 5(4), and amending 6(4)(a). These changes will reduce red tape by removing requirements for market participants to restate in ETS, information already communicated through e-tag curtailments and ATC postings.</p> <p>The removal of s. 5(3)(b) and amendment to s. 6(4)(a) removes the requirement for market participants to restate the available capability of the interchange transaction when the associated e-tag is curtailed.</p> <p>The removal of s. 5(4) removes the requirement in Section 203.6 that pool participants may restate the available capability of the interchange transaction when ATC limits are lowered after T-2. This change avoids the unnecessary repetition of information already communicated from balancing authorities to market participants.</p>

<sup>1</sup> The ‘appendix A’ attached to the AESO’s February 17, 2023, Letter of Notice contained an incorrect reference for the amendments to Section 203.6. Reference to s. 6(4)(c) in ‘appendix A’ should read 6(4)(a).



		<p>Morgan Stanley believes this logic can also be applied to the operators of the tie lines that connect the AESO to its adjacent balancing authorities. This would include the transmission providers of MATL and BCHA which operate as a function of ATC information they directly receive from the AESO as part of their regular ATC calculations.</p> <p>Morgan Stanley respectfully suggests including the following revisions in the proposed rule 203.6 language:</p> <p>(b) the transmission service for an energy interchange transaction is curtailed after procurement <del>either</del> by any transmission service provider OTHER THAN i) the ISO, OR ii) <u>TRANSMISSION SERVICE PROVIDER DIRECTLY INTERCONNECTED TO THE ISO</u>; then such a circumstance is a reason the pool participant must submit a restatement of available capability, and may be the basis for the determination of an acceptable operational reason under subsection (iv) of that definition</p> <p>We appreciate the opportunity to submit these comments and look forward to your feedback.</p>	
<p>203.6</p>	<p>s. 5(4)</p>	<p><b><u>Morgan Stanley’s late comments</u></b></p> <p>2. In support of the administrative reduction goal under the Red Tape Reduction process, Morgan Stanley further suggests the AESO <i>remove</i> 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>2. The AESO agrees with Morgan Stanely. Please see AESO Reply #1 above.</p>



		<p>Under s. 5(4) the AESO requests participants restate: “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>	
203.6	5(3)(b), 6(4)(a) <sup>2</sup>	<p><b><u>Powerex Corp.</u></b></p> <p>3. Powerex appreciates the opportunity to provide comments on the ISO Red Tape Administrative Amendments.</p> <p>With respect to the proposed change to section 203.6 (removing the requirements for pool participants to restate their available capability for interchange transactions in circumstances where an e-tag is <u>curtailed by the ISO</u>),</p> <p>Powerex believes that the requirement to restate the available capability of the interchange transaction when the associated e-tag is curtailed should be removed, <u>regardless of the entity</u> causing the reduction to the volume associated with an e-tag. The requirement to restate capability for curtailments issued by entities other than the ISO adds administrative burden, while doing nothing to support reliability or promote fair, efficient and open competition.</p>	<p>3. The AESO agrees with Powerex's recommendation. Please see AESO Reply # 1 above.</p>

<sup>2</sup> In ‘appendix A’ attached to the AESO’s February 17, 2023 Letter of Notice contained an incorrect reference in the table for the amendments to Section 203.6, s. 6(4)(c) is s. 6(4)(a).



The two e-tags included below (Y732779, Y782642) demonstrate situations which introduce challenges for pool participants to respond under the proposed rule amendments. In the examples below, the tags were curtailed by both AESO and BCHA with as little as one minute between curtailments. There is limited time for the pool participant to identify and restate capability for only non-AESO curtailments. Additionally, the ISO, as a party to the e-Tag, already has visibility into the curtailment regardless of the party issuing the curtailment. Therefore, restating the available capability for only non-AESO curtailments seems unnecessary because the pool participant would simply be reporting an instruction that the ISO is already aware of.

1. Y732779

Requests					
Req	Type	Author	Time	Status	
>>	Current Tag				
3	Curtailment	BCHA (TSP)	07/31/2022 19:41	APPROVED	
2	Curtailment	AESO (TSP)	07/31/2022 19:40	APPROVED	
1	Curtailment	BCHA (TSP)	07/31/2022 18:40	APPROVED	
0	Creation	PWX01 (PSE)	07/31/2022 17:02	APPROVED	

2. Y782642

Requests					
Req	Type	Author	Time	Status	
>>	Current Tag				
3	Curtailment	AESO (TSP)	12/2/2022 05:16	APPROVED	
2	Curtailment	AESO (TSP)	12/2/2022 05:45	APPROVED	
1	Curtailment	BCHA (TSP)	12/2/2022 05:40	APPROVED	
0	Creation	PWX01 (PSE)	12/2/2022 04:02	APPROVED	

Powerex’s above request is consistent with earlier comments made by Powerex and other pool participants, including the MSA (see MSA ISO Rule Proposal to amend an existing ISO rule dated 01/16/2020). It is our understanding that the ISO intended to adopt the requested action in 2019, however the amendment was withdrawn when the capacity market application was terminated. Powerex submits that the rationale for the earlier requests remains the same today and removing the requirement would enhance efficiency and reduce the administrative requirements that are not necessary to either support reliability or promote fair, efficient and open competition.



<p>203.6</p>	<p>6(4)</p>	<p><b><u>TransCanada Energy Ltd. (TCE)</u></b></p> <p>4. The language contained in blacklined versions of this section from Appendix “A” and the Red Tape Administrative Amendments does not read properly and are inconsistent with the language contained in the clean version of the Red Tape Administrative Amendments. Please confirm that the language contained in the clean version is as was intended.</p> <p>TCE agrees that adding the words “other than” removes an unnecessary requirement for pool participants. However, TCE submits that the AESO should go further by removing another unnecessary pool participant requirement. TCE understands that the AESO is a party to all eTags for interchange transactions into/out of Alberta, and as such has the same visibility to curtailments (or reloads) issued by any transmission service provider that is party to the eTag. TCE also understands that the AESO does not rely on the ETS system for the purpose of operating the AIES. Placing an obligation on pool participants to submit AC restatements via ETS to inform the AESO of information it has already received is inefficient and unnecessary. In the interest of red tape reduction, TCE submits that subsection 6(4) should be amended to remove any obligation on pool participants to restate the AC of source or sink assets in response to curtailments or reloads.</p>	<p>4. The AESO confirms that the language contained in the blackline version is what was initially intended.</p> <p>The AESO agrees with TCE’s recommendation to amend 6(4). Please see AESO Reply #1 above.</p>
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Red Tape Administrative Amendments			
Table B: Updates drafting style of the ISO Rule			
ISO Rule	Subsection	Stakeholder Comments	AESO Reply
Section 103.2	2(2)	<p><b>TransAlta</b></p> <p>5. I had a very minor administrative fix regarding the ISO Rules Red Tape:</p> <p><b>Requirements</b>  <b>Informal Dispute Resolution</b></p> <p>2(1) The first step a <b>market participant</b> must take to resolve a dispute with the <b>ISO</b> is to make reasonable efforts to informally resolve the dispute with the appropriate representative of the <b>ISO</b>.</p> <p>(2) A <b>market participant</b> may call the <b>ISO</b> main reception telephone number posted on the AESO website if the <b>market participant</b> is unsure of the appropriate representative of the <b>ISO</b> to contact <b>about the dispute</b>.</p>	<p>5. The AESO confirms that the language contained in the clean version was added in error and will amend accordingly.</p>
Multiple Rules	Multiple subsections	<p><b>TransCanada Energy Ltd. (TCE)</b></p> <p>6. The AESO proposes to replace the phrase “as soon as reasonably practicable” with “as soon as practicable” stating that the “[c]ourts have confirmed the equivalency”. Please provide the associated reference(s) to the court decision(s).</p>	<p>6. Several courts have commented on this matter. For example, see <a href="#">R v Singh, 2017 ONCJ 386</a> at paragraph 15.</p>