

## Stakeholder Comment Matrix – May 7, 2021

### Additional Feedback from the Second Stakeholder Consultation Session on the Development of the Proposed Amended Section 306.7 of the ISO Rules, *Mothball Outage Reporting*



<b>Period of Comment:</b> May xx, 2021 through May xx, 2021	<b>Contact:</b> Mark Nesbitt
<b>Comments From:</b> Market Surveillance Administrator	<b>Phone:</b>
<b>Date:</b> 2021/05/25	<b>Email:</b> Mark.nesbitt@albertamsa.ca

#### Instructions:

1. Please fill out the section above as indicated.
2. Email your completed comment matrix to [rules\\_comments@aeso.ca](mailto: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?	

	Question	Stakeholder Comments
2.	Do you have any feedback on the “transmission access” issues identified by the AESO?	<p>With respect to the jurisdictional review the AESO presented, the MSA notes that there is no legal requirement in any of the comparison jurisdictions for the transmission system to be free of congestion. Consequently, there are additional considerations in Alberta in the form of system costs brought about by mothballed units.</p> <p>These potential system costs are a result of the reasonable possibility that a mothballed unit may not become economic in the future and would not return to operation. The current structure of the rule could result in inefficient transmission build because of the uncertainty created by mothball outages with unaltered STS contracts.</p> <p>Any changes to the components of the mothball rule that relate to transmission access should focus on reducing uncertainty regarding transmission use for the mothballed units.</p>
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.	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.	
5.	Are you supportive of the AESO’s recommendation to maintain the existing 24-month maximum duration? Please explain.	
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.	

	Question	Stakeholder Comments
7.	Do you have any additional feedback on the interdependencies between transmission access, maximum duration, and subsequent outages? Please explain.	From the perspective of efficiency, as discussed in response to question 2, the MSA believes that discussions related to interconnection, maximum duration and subsequent outages are inextricably linked and are best reviewed as a package. To the extent that a particular combination of parameters helps the AESO in reducing the uncertainty around transmission usage arising from mothball outages, that combination may be a good candidate to address the risk of inefficient transmission build.
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.	
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.	
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.	<p>The MSA submits that is essential for the AESO to maintain the existing three-month notification timeline for a mothball outage request. The MSA requires this time period to complete an assessment of the mothball outage to determine whether the outage satisfies the economic test. It would be costly and inefficient for a unit to go offline on a mothball outage, only to be called back shortly thereafter because the economic test was not satisfied.</p> <p>A waiver of the three-month notification period may be acceptable if the AESO can complete its reliability studies and the MSA can complete its assessment of the economic test on an accelerated schedule. However, if these conditions cannot be satisfied before the notification period has elapsed, the unit must be required to wait the three months.</p>

	Question	Stakeholder Comments
11.	Are you supportive of the AESO's proposal for separate mothball outage reporting? Please explain.	<p>The MSA is supportive of the AESO's proposal for separate mothball outage reporting. Timely and updated reporting in a central location will allow all market participants to make decisions regarding their assets with up-to-date, accurate information.</p> <p>The MSA believes that the publication of this information will support fair, efficient and open competition and satisfy the requirement in section 4 of the FEOC Regulation to report outage information, aggregated by outage type.</p>
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.	
13.	Do you have any additional comments?	<p>The MSA supports the AESO's decision to remove the economic test from the scope of the consultation. The MSA believes that the economic test is essential to ensure the rule supports fair, efficient and open competition. Further, the MSA is of the view that the components of the economic test, avoidable cost and forecast market prices and conditions, are a reasonable basis from which to assess whether a unit is economic. The MSA further submits that, depending on the maximum term for a mothball outage, the AESO should require that an updated attestation based on the economic test be submitted at regular intervals.</p> <p>The MSA believes that the knowledge that mothball outages can only be taken after an economic test may act to reduce the uncertainty for potential entrants. Adding a requirement that the economic test be repeated for mothballed assets at a regular interval may further decrease the uncertainty.</p>