

## Alison Desmarais

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**From:** Ferrer, Rose <RFerrer@enmax.com>  
**Sent:** Tuesday, December 10, 2019 2:03 PM  
**To:** ISO Rules Comment  
**Subject:** Proposed Section 203.1, Offers and Bids for Energy - ENMAX Comments

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Good Afternoon,

In response to the AESO's letter of noticed dated November 27, 2019, regarding proposed amended ISO Rule Section 203.1, *Offers and Bids for Energy*, ENMAX Corporation submits the following comments below:

### 1. ISO Rules Previously Consulted on During the AESO's Capacity Market Implementation Process

While ENMAX appreciates the AESO's ongoing efforts to review and ensure ISO rules remain reflective of the current market place, the proposal to proceed directly with submitting an application to the AUC for approval of proposed amended Section 203.1 does not satisfy requirements set out in AUC Rule 017 or align with AESO's stakeholder engagement framework.

The original context under which engagement for this particular rule took place was the expectation that Alberta would be implementing a Capacity Market. Given the Government's announcement to maintain an energy only market, additional policy changes and length of time that has passed since initial consultation occurred (over one year), the AESO should undertake a new consultation on Section 203.1 to ensure that the proposal to introduce a new requirement for ramp table submissions is still required and relevant.

Granted there were a number of ISO rules previously consulted on during the capacity market implementation process, the AESO should identify which changes are purely administrative in nature versus new requirements. For those rules that contain material changes or new requirements, stakeholders should have a fair and reasonable opportunity to revisit those rules and provide additional feedback, prior to them being forwarded to the AUC for approval. This would ensure that transparency and stakeholder confidence is maintained.

### 2. Further Clarity Required Regarding New Ramp Table Requirements

ENMAX seeks to re-clarify the AESO's rationale for requiring ramp table submissions under Section 203.1, and welcomes further discussions on the proposed change.

Subsection 6(1) states the following:

*"A pool participant that submits an offer must also submit the following operating constraints:*

- (a) ramp rate;*
- (b) for a generating source asset, a ramp table in the manner the ISO specifies after a date specified by the ISO; and*
- (c) the initial start-up time."*

During the capacity market consultations, the AESO confirmed that ramp tables would be used for information purposes only. Should the AESO move forward with its proposal, it is ENMAX's understanding that stakeholders would not be taking on any new compliance risk as a result.

Subsection 6(2) states the following:

“A pool participant must submit to the ISO any changes to the operating constraints of a source asset as soon as reasonably practicable.”

Further stakeholder engagement is required to understand the AESO’s proposed submission requirements and whether there are any constraints in providing such information. Currently, there is little clarity regarding what information will be required and what the process would be for submitting this information to the AESO. Depending on the granularity of detail and frequency of updates required (e.g., daily, hourly, etc.), this would increase the scope of work and result in new processes.

ENMAX appreciates the opportunity to provide comments and looks forward to further discussions on this topic.

If you have any questions, please let me know.

Thank you,

**Rose Ferrer**

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