

Stakeholder Comment Matrix

Development of Proposed Amended ISO Rules and AESO Consolidated Authoritative Documents Glossary Definitions, collectively referred to as the “TCM Updates”



<p>Period of Comment: February 6, 2020 through February 21, 2020</p> <p>Comments From: ENMAX Corporation</p> <p>Date: 2020/02/19</p>	<p>Contact: Rose Ferrer</p> <p>Phone: 403-514-3886</p> <p>Email: rferrer@enmax.com</p>
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Instructions:

1. Please fill out the section above as indicated.
2. Please refer back to the Consultation Letter under the “Attachments” section to view materials related to the proposed TCM Updates.
3. Please respond to the questions below and provide your specific comments (if any). Blank boxes will be interpreted as favourable comments.

The AESO is seeking comments from Stakeholders on the development of the proposed TCM Updates 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 proposed TCM Updates? Please comment.	No comment.
2.	Do you agree or disagree with the potential objective or purpose of proposed TCM Updates? 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 consultation group is required for this rule development? Please comment.	Yes, ENMAX intends to participate in any related consultation.



	Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
5.	Do you have any additional comments?	<p>ENMAX has the following preliminary comments regarding the proposed TCM updates.</p> <p>1. Terms and Definitions – TCM Updates</p> <p><u>Proposed:</u></p> <p>“acceptable operational reason” means any 1 or more of the following:</p> <p>(vii) re-positioning a generating source asset within the energy market in response to:</p> <ul style="list-style-type: none"> a) a distribution constraint that causes a limitation to the normal economic merit operation of the generating source asset, or to the flow of electrical energy from the generating source asset from one part of the electric distribution system or an electric system within the service area of the City of Medicine Hat to any other part of either of those systems; or b) [...] <p><u>ENMAX Comments:</u></p> <p>The AESO is introducing a new AOR in response to a distribution constraint. ENMAX seeks further clarity regarding this proposed change and requests that the AESO provide a few examples to better illustrate when this situation would occur.</p>



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		<p>2. Section 202.6, Adequacy of Supply</p> <p><u>Proposed:</u></p> <p>2 The AESO must, in order to assist in determining whether to cancel a planned outage, delayed forced outage, or automatic forced outage under Section 306.5 [...].</p> <p><u>ENMAX Comments:</u></p> <p>Section 306.5, <i>Generation Outage Reporting and Coordination</i> only gives the AESO the authority to issue outage cancellation directives on a planned outage or a delayed forced outage. Since 202.6 should align with 306.5, “automatic forced outage” should <u>not</u> be included in 202.6. An automatic forced outage is not discretionary.</p> <p>3. Section 202.7, Markets Suspension or Limited Markets Operations</p> <p><u>Proposed:</u></p> <p>Removal of Subsection 3(2)(c) and 9(2)(c) – requirement for AESO to provide estimate of data and time of return to ordinary course of market operations.</p> <p><u>ENMAX Comments:</u></p> <p>ENMAX requests further information from the AESO regarding why the requirement to provide reasonable estimate of resumption in 202.7 is being removed. To maintain transparency, this should remain as an AESO requirement as it is not a significant burden with specific timelines or accuracy requirements.</p>