

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: Market Surveillance Administrator</p> <p>Date: 2020/02/20</p>	<p>Contact: Matt Ayres</p> <p>Phone: 403-705-3193</p> <p>Email: matt.ayres@albertamsa.ca</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.	<p>The MSA notes that the “Issue” identified by the AESO in its February 6, 2020 memorandum (“Memorandum”) suggests the need for “improved clarity” to be obtained by amending two existing definitions. The AESO has not clearly articulated why additional clarity is required or who would benefit from this clarity.</p> <p>The MSA also notes that transmission constraints on the AIES is an issue, but queries whether or not it needs to be addressed at this time if the effect is to delay other issues identified by the AESO in current ISO rules work plan. Can the AESO advise whether or not the latter would be the case?</p>
2.	Do you agree or disagree with the potential objective or purpose of proposed TCM Updates? Please comment.	<p>The MSA notes the Objectives/Purpose stated in the above Memorandum, however, the MSA believes that these should also include a “FEOC” purpose. That is, do the proposed TCM Updates support the fair, efficient and openly competitive operation (FEOC) of the electricity market or not?</p>

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3.	Do you agree or disagree with the proposed form of consultation and timelines? Please comment.	In the event there are stakeholder comments that raise other issues arising from the proposed TCM Updates, in addition to “improved clarity”, the MSA assumes that the AESO would be prepared to adjust its timelines to accommodate these issues. Can the AESO advise if that is the case?
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, the MSA intends to participate in any related consultation. The MSA sees no need for a consultation group at this time.
5.	Do you have any additional comments?	<p>The following are additional comments intended to articulate some of the potential market and FEOC concerns the MSA feels need to be considered.</p> <ol style="list-style-type: none"> 1. The AESO is proposing to make substantive amendments to the definition of a “transmission constraint” (proposed to be known as a “transmission market constraint”). The AESO’s rationale is that a number of ISO rules and definitions would “benefit from improved clarity”. The MSA believes it would be beneficial to articulate what these benefits would be. Without better articulation of the benefits, the MSA is concerned that: <ul style="list-style-type: none"> • the new definition changes rather than clarifies when the rule would be used. The narrower definition of “transmission market constraint” would result in an under-reporting of constraints on the AIES. For example, a constraint on a radial line that results in the disconnection of a generator at the end of the line from the AIES would currently be considered to be a constraint whereas in the new definition it would not.

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		<ul style="list-style-type: none"> • there may be circumstances where the AESO is unable to comply with the current ISO rule. If that is the case, has the AESO explored technical solutions that would allow it to comply with the current rule rather than to seek a rule change? <ol style="list-style-type: none"> 2. The AESO proposing to make substantive amendments to the definition of an “acceptable operational reason”. Again, there may be benefits from clarification but the AESO has not articulated what those benefits are supposed to be. The AESO should articulate these benefits. 3. The new definition of “acceptable operating reason” includes instances where a transmission outage results in the disconnection of a generating unit from the AIES. Under the current rules the MSA agrees there is a lack of clarity as to what market participants should do if a generating unit was disconnected. In the past, some market participants have reduced available capability and some have not. The MSA is supportive of efforts to improve clarity and consistency as to what market participants should do in these circumstances. However, the MSA has the following comments and concerns:



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		<p>a) The proposed rule change appears to create additional obligations for market participants who are generators. These obligations may be more efficiently and appropriately placed on other market participants. Is the AESO proposing that generators who are disconnected from the electric system will be required to seek information about the likely duration of the transmission outage from the TFO and pass this on to the AESO? Are the AESO or TFO not in a better position than generators to be apprised of transmission outages and their likely resolution? Further, how should generators ensure they are not left in a position where they may be seen to be “misrepresenting to the electricity market or to any other person the availability of...electric energy” (see subsection 2(d) of the <i>Fair, Efficient and Open Competition Regulation</i>)?</p> <p>b) The rule change treats transmission constraints that do not result in disconnection of a generating unit differently from those that do result in a disconnection. The MSA understands that under the AESO’s proposal where transmission constraints reduce the amount of electric energy that can flow down a transmission line but the generating unit is not disconnected, the market participant is not required to restate the available capability of the unit. However, should the constraint result in a disconnection of a generating unit the market participant would be required to report a generator outage on the unit. This outage would no longer be recorded as a transmission constraint. There appears to be a lack of consistency of approach between the obligations to report available capability changes for transmission constraints depending on the severity of the constraint. Can the AESO explain the rationale for this?</p>

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		<p>c) The proposed rule change mixes transmission and generator outages which impacts outage reporting. Under the proposed TCM updates certain transmission outages will result in reductions of available capability at generators which in turn is reflected in increased generator outages. Section 4(3) of the <i>Fair, Efficient and Open Competition Regulation</i> requires outage records be made public by category including i) generating unit type; and ii) transmission facility. It appears a consequence of the AESO's proposal would be to reduce the granularity/transparency of generation and transmission outage reporting. Does the AESO anticipate any reduction of visibility in its outage reporting as a consequence of the proposed rule changes and how would the AESO address the issue?</p>