

Stakeholder Comment Matrix – January 5, 2021

Development of Proposed Amendments to Section 202.6 of the ISO rules, *Adequacy of Supply* (“Section 202.6”)



Period of Comment: January 5, 2021 through January 22, 2021	Contact: Nick Jansen
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Instructions:

1. Please fill out the section above as indicated.
2. Please refer back to the Letter of Notice under the “Related Materials” section to view related materials.
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 proposed amendments to Section 202.6 of the ISO rules, Adequacy of Supply, 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 amendments to Section 202.6? Please comment.	Heartland Generation agrees that the AESO should revise Section 202.6 to include wind and solar generation in the adequacy assessment; however, the elimination of forecasting methodologies and reporting requirements from the rule raises concerns over transparency and accountability – see below.



Development of a Proposed ISO Rule		Stakeholder Comments and/or Alternate Proposal
2.	Do you agree or disagree with the potential objective or purpose of proposed amendments to Section 202.6? Please comment.	<p>Heartland Generation has the following comments regarding the AESO’s reporting:</p> <ol style="list-style-type: none"> 1. In reference to section 2, the AESO states that “Notwithstanding this proposed amendment, the AESO plans to continue its practice of publicly posting the results of its supply adequacy forecasts on a daily basis.” 2. In reference to section 3, the AESO states “Notwithstanding this proposed amendment, the AESO plans to continue its practice of publicly posting the results of its Supply Adequacy Report.” 3. In reference to section 4, the AESO states “The AESO plans to continue providing the metrics in a format similar to the current format.” <p>If the AESO intends to maintain its reporting for these items, it should detail the associated reporting requirements in the rule explicitly. These reporting functions aid market participants and should be included in the authoritative document to increase accountability.</p> <p>Further, Heartland Generation believes that, where possible, all relevant information regarding a rule should be included in the authoritative document and not an information document.</p>
4.	Do you agree or disagree with the proposed form of consultation and timelines? Please comment.	Heartland Generation has no comment.
5.	Do you have any additional comments?	