

<p>Period of Comment: October 26, 2020 through November 9, 2020</p> <p>Comments From: ENMAX Corporation</p> <p>Date: 2020/11/9</p>	<p>Contact: Mark McGillivray</p> <p>Phone:</p> <p>Email: MMcGillivray@enmax.com</p>
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Instructions:

1. Please fill out the section above as indicated.
2. Please refer back to the *Letter of Notice for Feedback on the Content of Proposed Options for Amended Section 505.2* under the “Related Materials” section to view the actual draft proposed materials on amended Section 505.2.
3. Please respond to the questions below and provide your specific comments, proposed revisions, and reasons for your position underneath (if any). Blank boxes will be interpreted as favourable comments.
4. Please be advised that general comments do not give the AESO any specific issue to consider and address, and results in a general response.

Item #		Stakeholder comments
1	Please comment on the stakeholder session hosted on October 8, 2020. Was the session valuable? Was there something the AESO could have done to make the session more helpful?	ENMAX appreciates the AESO’s consultation efforts. We have no suggestions for changes to the session.
2	Which option do you prefer and why?	Option 1 is only slightly preferable to Option 2 as currently contemplated. Both Options have room to be more precise in definitions and have enhanced clarity of the mechanics. Storage assets need to be considered in these options. They can be combined with renewable facilities and with thermal generation. Option 2 imposes no meaningful performance requirements. There appears to be a strong bias to refund much if not all amounts in both options. Intermittent generation units are

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		granted refunds at low capacity factors in particular.
3	Do you have any concerns with the option you chose?	<p>The term “critical maximum capability” needs to be a defined term in this context.</p> <p>Energy market offers can be provided by renewable facilities so this may need to be reviewed in the Option 1 as it may impact the availability assessment.</p>
4	Do you have any concerns with the option you did not choose?	<p>The term “availability factor” as used in Option 2 is not consistent with its typical usage. It may be less confusing if a different name is used.</p> <p>Let MC_1 be the maximum capability of the generating unit or aggregated generating facility on the first day of each calendar year during the refund period and let CMC be its critical maximum capability. The condition for a penalty factor is therefore $MC_1 < CMC$.</p> <p>The first day of the calendar year may not be the best way to measure CMC for the year.</p>
5	Any additional comments regarding the proposed amended Section 505.2?	Refunding the GUOC amounts seem to be the norm and this mechanism does not act as a strong signal for generators. Given this reality – the goal should be simplicity and not imposing added risks on operational generators.

Please provide any additional comments or views on the type of content that should be included in an information document associated with the proposed amended Section 505.2

A realistic assessment of the quality of the signal that GUOC produces for new generation.

The AESO should consult one more time on the proposed rule that is selected.

We suggest the AESO to consult one more time on the revised draft of the rule. The definitions of critical and energized maximum capability should be carefully reviewed so the formulas act as intended and there is no confusion on the expected refunds.