

Development of Proposed Amendments to Section 306.7 of the ISO rules, *Mothball Outage Reporting*

<p>Period of Comment: October 14, 2020 through October 29 , 2020</p> <p>Comments From: TransCanada Energy Ltd. (TCE)</p> <p>Date: 2020/10/29</p>	<p>Contact: Mark Thompson</p> <p>Phone: 403-589-7193</p> <p>Email: markj_thompson@tcenergy.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 development of amendments to Section 306.7 of the ISO rules, *Mothball Outage Reporting* (the “Mothball rule”).
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 amendments to the Mothball rule 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 issues identified require the development of an amended Mothball rule and a review of the broader framework for removing generating capacity from the market? Please comment.	<p>In general, there are issues with the existing Mothball rule that should be addressed. In the AESO’s letter of notice, the AESO identified six issues. The first issue is “the economic requirements to temporarily remove generating asset from the market”. With respect, this issue was adequately addressed in the disposition of the MSA’s complaint whereby an attestation requirement was added to the rule. While this requirement was implemented on an expedited basis, it was the result of a negotiated settlement that included a number of stakeholders. TCE agrees that the remaining five issues from the letter of notice should be addressed.</p> <p>TCE does not agree that a “review of the broader framework for removing generating capacity from the market” is an issue that ought to be discussed. Such a discussion would be of a much larger scope than mothball outages, and is unwarranted. Under Alberta’s energy-only market, generators take on the investment risks and must maintain the ability to determine when and how its capacity is to be removed from the market, subject to the FEOC Regulation.</p>

	Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
2.	Do you agree or disagree with the potential objectives or purpose of the review of the Mothball rule and a review of the broader framework for removing generating capacity from the market? Please comment.	Please see the comments in #1 above.
3.	Do you agree or disagree with the proposed form of consultation? Please comment.	TCE does not object to the proposed form of consultation.
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.	TCE has participated in all of the AESO's consultation sessions on this issue to date and intends to continue to participate. TCE submits that the issues proposed for discussion are complex, which would warrant a consultation group.
5.	Do you agree or disagree that the development of proposed amendments to the Mothball rule should proceed at this time?	This would be the fourth time stakeholders have expended resources to discuss amendments to this rule. The AESO's initial discussions were held through the Summer and Fall of 2016. The AESO did not re-commence discussions until the Summer of 2017 and put them on-hold shortly thereafter. Discussions commenced once again in Spring 2018 pursuant to the MSA's complaint. TCE is not suggesting that any party is at fault for the disjointed process, only that it has been inefficient. On this basis, TCE does not object to amending the mothball rule at this time provided the AESO can commit to follow-through and not put the consultation on hold once again.
6.	Do you have any additional comments?	TCE has no further comments at this time.