



<p>Period of Comment: January 29, 2021 through February 16, 2021</p> <p>Comments From: ENMAX Corporation</p> <p>Date [yyyy/mm/dd]: 2021/02/16</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 of a Proposed ISO Rule* under the “Attachments” section to view related materials for the TCM Updates.
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	Whether you understand and agree with the objective or purpose of the proposed TCM Updates and whether, in your view, the proposed TCM Updates meets the objective or purpose, and if not, why.	<p>The proposed TCM Updates do not appear purely administrative in nature given the AESO is proposing to expand and introduce new definitions. ENMAX submits the following comments below.</p> <p>Expanded “AOR” Definition – Communication Process Required between Generators and TFOs</p> <p>The proposed expanded AOR definition does not appear to contemplate a process which would ensure that generators can expect to receive timely and accurate updates from the TFO, ultimately placing the onus solely on generators to confirm there are no transmission issues limiting their capacity. In ENMAX’s view, generators have limited visibility on transmission outages and would rely on a 3rd party for this information. As such, TFO’s should be included in this consultation and a clear communication process should be established between TFOs and generators. Generators cannot be obligated to provide best available information from another entity, it can only pass on what it gets and has no</p>

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		<p>ability to determine if it is reliable information and often has no documentation to rely upon from a TFO for unplanned Transmission outages.</p> <p>Proposed removal of subsections 3(2)(c) and 9(2)(c) from Section 202.7, Markets Suspension or Limited Markets Operations.</p> <p><i>“The ISO, from time to time, may issue a subsequent declaration updating market participants on limited market operations developments as circumstances warrant, including the return to ordinary course market operations.”</i></p> <p>To address stakeholder concerns, the AESO indicated that it would propose to amend the relevant provisions in Section 202.7 to reflect that the AESO will provide an update, when available, on the resumption of ordinary market operations. However, the highlighted text above indicates this will remain at the AESO’s discretion. ENMAX is of the view that the above statement should be revised to ensure some commitment from the AESO to keep market participants updated on developments or timelines for restoring normal operations, with some added timeliness criteria so it is more defined that it is an urgency to communicate this type of information.</p>
2	Whether you agree that the proposed TCM Updates is not technically deficient, and if not, why.	No comment.
3	Whether you agree that the proposed TCM Updates, taken together with all ISO rules, supports a fair, efficient and openly competitive market, and if not, why.	It would improve visibility on generator constraints on the outage graph with perfect information access, but because it relies on 3 rd party information, it is not fair to expect generators to have access to factual and timely information on constraints outside a generator’s property boundaries.
4	Whether you agree that the proposed TCM Updates supports the public interest, and if not, why.	No comment.
5	Any additional comments regarding the proposed TCM Updates	There should not be any compliance related obligations on generators in providing this 3 rd party information to the market using AESO systems.