

Period of Comment: March 24, 2021 through April 15, 2021	Contact: Jeremy Yungwirth
Comments From: SaskPower	Phone: 639-590-3950
Date: 2021/04/13	Email: jyungwirth@saskpower.com

Instructions:

1. Please fill out the section above as indicated.
2. Please respond to the questions below, and provide your specific comments and proposals (if any).
3. Please provide an estimate of cost and/or time savings associated with your specific comments and proposals (as applicable).

The AESO is seeking comments from Stakeholders on the development of proposed amended Section 103.3 with regard to the following matters:

	General Questions regarding the ISO Rule Development	Stakeholder Comments and/or Proposal	Cost and/or time savings estimate
1.	Do you agree or disagree that the issue and purpose identified in the letter of notice? Please comment.	SaskPower supports the issue to explore the opportunity to reduce regulatory requirements and costs for Stakeholders.	
2.	Do you agree or disagree with the proposed consultation and timelines? Please comment.	SaskPower supports the proposed consultation and timelines.	
3.	Do you have any recommended amendments to the proposed amended Section 103.3.	SaskPower would ask the AESO to review the financial requirements currently in place and reconsider the requirement for SaskPower to post collateral due to SaskPower not having a company specific credit rating from a rating agency. Agreements with Canadian and US Banks and U.S. RTO's reference the province of Saskatchewan's credit rating given the flow through nature of the province's rating. Recognizing the province of Saskatchewan's credit rating will not increase the impact on the risk of financial loss as SaskPower is a Crown Corporation of the province of Saskatchewan.	<i>This would save the AESO and SaskPower the time and effort involved in setting up, reviewing and approving collateral. This involves work from both entities credit functions and involves a monetary cost to SaskPower related to the cost of a Letter of Credit.</i>
4.	Do you have any additional comments?		