

## Stakeholder Comment Matrix – October 9, 2018



### Development of Proposed New and Amended ISO rules

<b>Period of Comment:</b> October 9, 2018 through October 24, 2018 <b>Comments From:</b> TransAlta <b>Date [yyyy/mm/dd]:</b> October 24, 2018	<b>Contact:</b> David Michaud <b>Phone:</b> (403) 267-4913 <b>Email:</b> David_Michaud@transalta.com
-----------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------

**The AESO is seeking comments from Stakeholders on the development of proposed new and amended ISO rules with regard to the following matters:**

Re: Proposed new ISO Rules Section 502.17 and amendment of existing Section 502.4.

	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 the proposed new and amended ISO rules? Please comment.	<i>Given the AESO has identified content overlap in certain authoritative documents and a need to improve the clarity of requirements, TransAlta agrees the amendment and new rule are required.</i>
2.	Do you agree or disagree with the potential objective or purpose of the proposed new and amended SO rules? Please comment.	<i>TransAlta agrees with the objectives/purpose described in the AESO October 9, 2018 Letter of Notice.</i>
3.	Do you agree or disagree with the proposed form of consultation and timelines? Please comment.	<p><i>TransAlta appreciates the AESO having provided an opportunity for TransAlta to participate in consultation as a member of the Telecommunication Workgroup which is part of the Alberta Reliability Committee Discussion Group (ARCDG).</i></p> <p><i>TransAlta requests the AESO include language within new Section 502.17 which would provide the AESO with the authority to grant waivers or variances requested by market participants. Should the AESO not be amendable to inclusion of such language, then we request the AESO form a consultation group and work with market participants to ensure the concern is understood and considered by the AESO and in order for market participants to understand the AESO's rationale.</i></p> <p><i>As context, TransAlta has reviewed a draft of new ISO Rules Section 502.17 which was provided by the AESO to attendees at an April ARCDG meeting. Section 2 of that</i></p>

		<p><i>draft relates to waivers or variances respecting the AESO requiring a market participant to comply with requirements in addition to those of Section 502.17. TransAlta requests the AESO also include a section providing the AESO with the authority to grant waivers or variances requested by market participants. The reason for our request is two-fold. Firstly, parties could potentially not comply with all requirements described in Section 502.17 and could require a mechanism to apply for and receive a variance or waiver from the AESO. Secondly, in response to past market participant requests for variances relating to certain generating unit technical requirements included in Section 502.5, the AESO denied such requests on the basis that an individual ISO Rule must include appropriate authority for the AESO to grant waivers or variances for that specific rule. The April draft of Section 502.17 does not include such authority.</i></p>
4.	<p>Do you intend to participate in any related consultation? <b>OR</b> Do you agree that no additional consultation group is required for this rule development? Please comment.</p>	<p><i>TransAlta does intend to participate in any related consultation which occurs with respect to inclusion of language granting the AESO authority to grant waivers or variances requested by market participants. .</i></p>
5.	<p>Do you have any additional comments?</p>	<p><i>We currently have no further comments.</i></p>