

Stakeholder Comment Matrix

Development of Proposed Amended ISO Rules and AESO Consolidated Authoritative Documents Glossary Definitions, collectively referred to as the “TCM Updates”



Period of Comment: February 6, 2020 through February 21, 2020

Comments From: TransCanada Energy Limited (TCE)

Date: 2020/02/21

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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 proposed TCM Updates.
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 the proposed TCM Updates with regard to the following matters:



	Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
1.	<p>Do you agree or disagree that the issue identified requires the development of proposed TCM Updates? Please comment.</p>	<p>TCE submits that the AESO has not adequately identified the issue with respect to the proposed changes to ISO Rule Section 202.7, Markets Suspension or Limited Markets Operations (Rule 202.7) and the definition of an acceptable operational reason (AOR).</p> <p>The AESO states that “a number of ISO rules ... would benefit from <u>improved clarity</u> pertaining to transmission outages and distribution constraints” [emphasis added]. Yet, the proposed changes to Rule 202.7 include the removal of the AESO requirement to provide “a reasonable estimate of the anticipated date and time of termination of the state of limited market operations, and the return to ordinary course markets operations”. TCE submits that this proposed change does not provide additional clarity and that the issue that requires this proposed change has not been identified in the February 6, 2020 letter. TCE recommends that the AESO clearly identify the nature of the issue that the proposed changes to Rule 202.7 are intended to solve.</p> <p>While TCE generally supports the provision of additional clarity for defined terms, TCE submits that the proposed change to the definition of an AOR is more significant than simply providing clarity as it will impose process changes upon market participants. TCE recommends that the AESO clearly identify the nature of the issue that the proposed changes to the definition of an AOR are intended to solve.</p>

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2.	Do you agree or disagree with the potential objective or purpose of proposed TCM Updates? Please comment.	<p>TCE is of the view that this section is incomplete. While certain of the proposed changes obviously provide clarity, alignment or are administrative in nature, others are not. For the latter, more information is required for market participants to understand why the AESO is proposing changes. This is essential for meaningful consultation since without it market participants will have insufficient information to enable them to provide alternate recommendations that may be amenable to the AESO.</p> <p>With respect to Rule 202.7, TCE would like to know why, and how the AESO determined that, the requirement to provide “a reasonable estimate of the anticipated date and time of termination of the state of limited market operations, and the return to ordinary course markets operations” is no longer needed. The purpose of this requirement is to provide information to market participants. Have market participants informed the AESO that this information is no longer needed? Or is it that the AESO simply no longer wishes to provide this information? If so, why not?</p> <p>As stated above, the proposed changes to the definition of an AOR are more substantive than providing additional clarity. TCE has opposed this amendment since the AESO first proposed this change in April 2018. TCE would like to work with the AESO to find a mutually acceptable solution. However, this will be difficult to accomplish without a thorough understanding of why the AESO is pursuing this amendment.</p>
3.	Do you agree or disagree with the proposed form of consultation and timelines? Please comment.	TCE has no issue with the proposed form of consultation, but notes that meaningful consultation may require the timelines to be relaxed somewhat depending on the circumstances.
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 intends to participant in the consultation.
5.	Do you have any additional comments?	Not at this time.