

<b>Period of Comment:</b> February 25, 2021 through March 18, 2021	<b>Contact:</b> Akira Yamamoto
<b>Comments From:</b> TransAlta Corporation	<b>Phone:</b> 403-267-7304
<b>Date:</b> 2021/03/18	<b>Email:</b> akira_yamamoto@transalta.com

Instructions:

1. Please fill out the section above as indicated.
2. 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 proposed amendments to the Financial Settlement Rules 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 issue identified in the letter of notice requires the proposed amendments to the Financial Settlement Rules? Please comment.	<p><b><i>The AESO's proposed red tape reduction will increase the burden and uncertainty for market participants.</i></b></p> <p>The AESO proposed red tape reduction only relieves itself of obligations with no consideration of the impacts to market participants.</p>
2.	Do you agree or disagree with the potential purpose of the proposed amendments to the Financial Settlement Rules? Please comment.	<p><b><i>Section 18: Preliminary Power Pool Statements should not be removed.</i></b></p> <p>TransAlta does not agree that the requirements in section 18 for the ISO to issue preliminary power pool statements should be removed. The process of preliminary to final statements is a key validation and verification process for market participants. The entire removal of this process relieves the AESO of any obligation to provide preliminary power pool statements and creates unnecessary process uncertainty and red tape for market participants. The process clarity provided through this section of the rule allowed market participants to design their internal processes with confidence about the requirements and timing expectations on the AESO.</p> <p><b><i>Dispute processes should contemplate how financial settlement disputes comport with Section 103.2: Dispute Resolution.</i></b></p> <p>We are not clear if the dispute process contemplated within this rule are considered separate and distinct process from Section 103.2: Dispute Resolution. We ask the AESO to consider providing greater guidance to market participants if a dispute under Section 103.4 is also a dispute under Section 103.2 or if a dispute under section 103.2 can ultimately be advance in a secondary process under section 103.4.</p>
3.	Do you agree or disagree with the proposed consultation and timelines? Please comment.	No comments at this time.
4.	Do you agree or disagree with the proposed amendments to the Financial Settlement Rules? Please comment.	As stated above in section 2 we do not agree with certain amendments to Section 103.4: Power Pool Financial Settlement.
5.	Do you have any additional comments?	No additional comments at this time.