

December 19, 2019

To: Market Surveillance Administrator, Market Participants and Other Interested Parties (“Stakeholders”)

**Re: Update on Proposed Amended ISO Rule: Section 203.1, *Offers and Bids for Energy* (“Section 203.1”)**

### **Background**

In a [letter](#) dated November 27, 2019, the AESO provided Stakeholders notice of its intent to proceed with submitting an application to the AUC for approval of proposed amended Section 203.1, the blackline of which was attached for reference. Proposed amended Section 203.1 was modified to include a provision requiring the submission of a ramp table. The AESO requested Stakeholder feedback on this approach and Stakeholders submitted comments to the AESO in response to the letter.

### **Stakeholder Feedback**

Stakeholders submitted feedback expressing concerns with the AESO’s proposal to proceed with submitting an application to the AUC for approval of proposed amended Section 203.1. The main Stakeholder concerns are summarized as follows:

- 1) The AESO should consult with stakeholders and provide transparency on how the submission of a ramp table relates to the dispatch tolerance work.
- 2) The manner, timing, and accuracy of ramp table submission is authoritative and should be subject to consultation and AUC oversight to ensure Stakeholders have a reasonable opportunity to comply with the requirement.
- 3) The AESO should provide greater transparency on how ramp table information will be used and whether there will be implications for dispatch compliance now, or in the future.
- 4) The AESO has not provided sufficient rationale for the requirement to submit a ramp table. The material costs of submitting a ramp table may outweigh its benefits.
- 5) Changes to the Energy Trading System should be consulted on to ensure Stakeholders have the opportunity to update necessary internal systems to comply with the requirements.
- 6) The expedited nature of the AESO’s consultation during the capacity market initiative provided Stakeholders with limited ability to review the changes.

### **Proposed Next Steps**

Based on the feedback from Stakeholders, the AESO has determined it will not proceed with filing amended Section 203.1 at this time. The AESO will consult on the changes to Section 203.1 as part of the market initiative on dispatch tolerance, which is scheduled to commence in Q2 2020. While the requirement to submit a ramp table under amended Section 203.1 was intended for informational purposes

only at this time, the AESO appreciates Stakeholder concerns regarding the timing of the submission and its interaction with the dispatch tolerance work.

The AESO also solicited feedback from Stakeholders on the proposed new and amended ISO rules and AESO terms and definitions for the "[TCM Updates for EAS](#)" and the "[Administrative Updates – EAS Rules](#)". The AESO is currently reviewing comments received and will update Stakeholders on the next steps for the TCM Updates for EAS and the Administrative Updates – EAS Rules in Q1 2020.

Yours truly,

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