



January 26, 2021

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

Re: **Stakeholder Comments on Letter of Notice – Development of Proposed Amendments to Section 202.6 of the ISO rules, Adequacy of Supply (“Section 202.6”)**

Pursuant to Section 5.2 Alberta Utilities Commission Rule 017, *Procedures and Process for Development of ISO Rules and Filing of ISO Rules with the Alberta Utilities Commission*, written comments received from Stakeholders in response to the Alberta Electric System Operator’s (“AESO”) January 5, 2021 Letter of Notice have been posted on the AESO website.

The written stakeholder comments can be found on the Stakeholder engagement page on the AESO website at [www.aeso.ca](http://www.aeso.ca). Follow the path Stakeholder engagement > Rules, Standards and Tariff > Proposed Amendments to Section 202.6 of the ISO rules, Adequacy of Supply

<b>Amendments to Section 202.6</b>
Capital Power Corporation
ENMAX Corporation
Heartland Generation Ltd.
Market Surveillance Administrator
Suncor Energy Inc.
TransAlta Corporation
TransCanada Energy Ltd.

Thank you to all Stakeholders who participated in this ISO rules comment process. All written comments received will be considered in the AESO’s finalization of the proposed amended Section 202.6.

Sincerely,

*Jodi Marshall*

Legal Manager, ISO Rules and Alberta Reliability Standards  
Legal and Regulatory Affairs  
[rules\\_comments@aesoc.ca](mailto:rules_comments@aesoc.ca)

## Stakeholder Comment Matrix – January 5, 2021

### Development of Proposed Amendments to Section 202.6 of the ISO rules, *Adequacy of Supply* (“Section 202.6”)



<b>Period of Comment:</b> January 5, 2021 through January 22, 2021	<b>Contact:</b> Santi Churphongphun
<b>Comments From:</b> Capital Power	<b>Phone:</b> 403-717-4639
<b>Date:</b> 2021/01/22	<b>Email:</b> schurphongphun@capitalpower.com

#### Instructions:

1. Please fill out the section above as indicated.
2. Please refer back to the Letter of Notice under the “Related Materials” section to view related materials.
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 proposed amendments to Section 202.6 of the ISO rules, Adequacy of Supply, 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 amendments to Section 202.6? Please comment.</p>	<p>Capital Power understands that there are two issues prompting the AESO’s proposed amendments to ISO Rule Section 202.6 (the “Adequacy of Supply Rule”).</p> <p><b>The Adequacy of Supply Rule Should be Amended to Enhance the Accuracy of the AESO’s Supply Forecasts and Assessments.</b></p> <p>First, the AESO has identified a need to reconsider the current exclusion of wind and solar resources as inputs to its long-term adequacy (LTA) assessment outlined at subsection 4 of the Adequacy of Supply Rule. Capital Power agrees that amendments in this regard are warranted given the continued and likely sustained wind and solar penetration in Alberta. Incorporating these resources as part of the AESO’s forecasts and assessments should improve adequacy metrics like the forecast reserve margin and supply cushion as well as allow for better decision making by those who use this information such as market participants, prospective investors and consumers.</p> <p>Capital Power recommends that the AESO provide more detail and further consult on the changes to incorporate these resources in the LTA assessment. The amendments should, in any case, be technology neutral where possible to avoid having to undertake future rule revisions to include other supply types.</p> <p><b>The Level of Detail in the Calculation of Short and Long-term Adequacy Must be Maintained.</b></p> <p>The second issue relates to the potential for red tape reduction. Capital Power does not agree with the proposed removal of the forecast and assessment elements to achieve this end. While Capital Power is generally supportive of removing unnecessary or duplicative requirements and reducing overall administrative burden, the AESO’s proposed changes are inconsistent with previously established government policy and AUC findings for the AESO to provide explicit steps in assessing adequacy.</p> <p>Though the adequacy assessments, to date, have not triggered an outage cancellation or preventative long-term adequacy actions by the AESO, this does not relieve the need for continued oversight of the supply shortfall thresholds. Capital Power submits that the governance of out-of-market AESO measures via these thresholds supersedes the AESO-identified need to remove the calculation details within the Adequacy of Supply Rule.</p>

	Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
2.	Do you agree or disagree with the potential objective or purpose of proposed amendments to Section 202.6? Please comment.	<p><b>The Adequacy Assessment Details Must Be Maintained to Preserve Oversight of Market Intervention.</b></p> <p>Capital Power disagrees with the AESO’s objective to remove the detailed calculations for short-term and long-term adequacy assessments in subsections 2, 3, and 4 as these calculations establish the threshold for when the AESO may take out-of-market actions to maintain system reliability. The AESO itself previously noted that this was directly linked to Section 18 of the Transmission Regulation as part of determining if such actions are required.<sup>1</sup></p> <p>While the AESO has committed to continue producing the adequacy forecasts and reports, their conversion into internal AESO processes or information documents will reduce overall oversight of when, for example, the AESO may intervene in the market to prevent a supply shortfall. In turn, this increases uncertainty for market participants given the thresholds would be at the AESO’s discretion and would no longer be subject to regulatory approval. The absence of this oversight could allow for the unnecessary increase of out-of-market action in the face of supply shortfalls. Such an outcome would be inconsistent with recommendations in the 2005 Alberta Electricity Policy Framework – that the AESO should take steps to make all accessible capacity available for dispatch in the event of an anticipated supply shortfall while also limiting the use of its own discretion for unit commitment.<sup>2</sup></p> <p>In a 2008 AUC proceeding to consider rules regarding long lead time energy dispatches and directives, the AESO explained that the threshold for supply adequacy established under the predecessor authoritative document – OPP 705 – is an interpretation of section 18 of the Transmission Regulation when having to determine the unexpected need for generation. The AESO’s intent at that time appears to have been to address the supply adequacy issues and capture recommendations of the 2005 Alberta Electricity Policy Framework. In particular, those recommendations looked to strike a balance between out-of-market steps to address anticipated supply shortfall while also limiting the use of AESO discretion.</p> <p>Removing these requirements now from the Adequacy of Supply Rule would be inconsistent not only with those policy recommendations but also with the Commission findings and expectation from the 2008 proceeding that the AESO “...clarify the measures it will use to determine that the adequacy assessment indicates insufficient supply to meet AIES demand” and that “... these measures will be reflected in the updates to OPP 705.”<sup>3</sup> [Emphasis added] It is clear from this that the forecast and assessment steps for supply adequacy within the rule were contemplated to be made explicit after deliberation before and as specified by the AUC. Capital Power believes this applies both to the AESO’s assessment of short and long-term supply adequacy.</p>

## Stakeholder Comment Matrix – January 5, 2021

### Development of Proposed Amendments to Section 202.6 of the ISO rules, *Adequacy of Supply* (“Section 202.6”)



Development of a Proposed ISO Rule		Stakeholder Comments and/or Alternate Proposal
3.	Do you agree or disagree with the proposed form of consultation and timelines? Please comment.	The proposed written format should be sufficient for this consultation though to the extent further amendments to related rules are included, the timelines may need to be revisited.
4.	Do you have any additional comments?	The AESO's <i>Proposed Section 202.6 Amendments and Rationales</i> document published with the letter of notice was helpful to see the revisions and understand the AESO's perspective. Capital Power appreciates the AESO's efforts in providing this as part of the consultation and encourages this practice to continue in future stakeholder engagements where substantial changes to authoritative documents are being proposed.

<sup>1</sup> AUC Decision 2009-007, para 49.

<sup>2</sup> *Alberta's Electricity Policy Framework: Competitive – Reliable – Sustainable* (6 June 2005), Alberta Department of Energy, p.23.

<sup>3</sup> AUC Decision 2009-007, para 54.

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<p><b>Period of Comment:</b> January 5, 2021 through January 22, 2021</p> <p><b>Comments From:</b> ENMAX Corporation</p> <p><b>Date:</b> 2021/01/21</p>	<p><b>Contact:</b> Mark McGillivray</p> <p><b>Phone:</b></p> <p><b>Email:</b> <a href="mailto:MMcGillivray@enmax.com">MMcGillivray@enmax.com</a></p>
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2. Please refer back to the Letter of Notice under the “Related Materials” section to view related materials.
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 proposed amendments to Section 202.6 of the ISO rules, *Adequacy of Supply*, 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 requires the development of proposed amendments to Section 202.6? Please comment.	See additional comments below.
2.	Do you agree or disagree with the potential objective or purpose of proposed amendments to Section 202.6? Please comment.	See additional comments below.
3.	Do you agree or disagree with the proposed form of consultation and timelines? Please comment.	Agree.



Development of a Proposed ISO Rule		Stakeholder Comments and/or Alternate Proposal
4.	Do you have any additional comments?	<p>ENMAX appreciates the AESO’s ongoing efforts to reduce regulatory burden, however, current Section 202.6 appears sufficient as is.</p> <p><b>Subsections 2, 3 and 4</b></p> <p>Specifically, ENMAX does not agree with the proposed removal of the detailed calculations for short-term and long-term adequacy assessments in subsections 2, 3 and 4. ENMAX views the detailed calculations as relevant and valuable information, as it provides transparency on how the AESO determines supply adequacy and can be referred back to by the market should concerns arise in the future relating to how adequacy was calculated or if it resulted in a planned outage being cancelled.</p> <p>The AESO has indicated that it will continue with detailed reporting and that the specific details would be more appropriately reflected in a supporting AESO information document, however, this may result in inconsistencies with what and how much information is reported and provided to the market. While the AESO uses additional tools and references to ensure the safe and reliable operation of the AIES, these tools help supplement but do not necessarily replace the value of having the details available for how market fundamentals are being forecasted.</p> <p><b>Subsections 7 and 8, and Administrative Amendments</b></p> <p>In regard to the proposed removal of sections 7 and 8, along with the administrative amendments, ENMAX currently has no concerns with the AESO moving forward with these changes.</p>

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<p><b>Period of Comment:</b> January 5, 2021 through January 22, 2021</p> <p><b>Comments From:</b> Heartland Generation Ltd. (HGL)</p> <p><b>Date:</b> [2021/01/22]</p>	<p><b>Contact:</b> Nick Jansen</p> <p><b>Phone:</b> 587-581-5905</p> <p><b>Email:</b> Nick.jansen@heartlandgeneration.com</p>
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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 proposed amendments to Section 202.6? Please comment.	Heartland Generation agrees that the AESO should revise Section 202.6 to include wind and solar generation in the adequacy assessment; however, the elimination of forecasting methodologies and reporting requirements from the rule raises concerns over transparency and accountability – see below.





Development of a Proposed ISO Rule		Stakeholder Comments and/or Alternate Proposal
2.	Do you agree or disagree with the potential objective or purpose of proposed amendments to Section 202.6? Please comment.	<p>Heartland Generation has the following comments regarding the AESO’s reporting:</p> <ol style="list-style-type: none"> <li>1. In reference to section 2, the AESO states that “Notwithstanding this proposed amendment, the AESO plans to continue its practice of publicly posting the results of its supply adequacy forecasts on a daily basis.”</li> <li>2. In reference to section 3, the AESO states “Notwithstanding this proposed amendment, the AESO plans to continue its practice of publicly posting the results of its Supply Adequacy Report.”</li> <li>3. In reference to section 4, the AESO states “The AESO plans to continue providing the metrics in a format similar to the current format.”</li> </ol> <p>If the AESO intends to maintain its reporting for these items, it should detail the associated reporting requirements in the rule explicitly. These reporting functions aid market participants and should be included in the authoritative document to increase accountability.</p> <p>Further, Heartland Generation believes that, where possible, all relevant information regarding a rule should be included in the authoritative document and not an information document.</p>
4.	Do you agree or disagree with the proposed form of consultation and timelines? Please comment.	Heartland Generation has no comment.
5.	Do you have any additional comments?	

## Stakeholder Comment Matrix – January 5, 2021

### Development of Proposed Amendments to Section 202.6 of the ISO rules, *Adequacy of Supply* (“Section 202.6”)



<p><b>Period of Comment:</b> January 5, 2021 through January 22, 2021</p> <p><b>Comments From:</b> Market Surveillance Administrator</p> <p><b>Date:</b> 2021/01/22</p>	<p><b>Contact:</b> Mark Nesbitt</p> <p><b>Phone:</b></p> <p><b>Email:</b> Mark.nesbitt@albertamsa.ca</p>
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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 proposed amendments to Section 202.6? Please comment.	The MSA is supportive of the AESO’s red tape reduction initiative and understands the need to identify and eliminate unnecessary, irrelevant, or duplicative requirements. The MSA has no concerns regarding the specific amendments to Section 202.6 of the ISO rules proposed in this consultation. The MSA will maintain its ability to monitor and assess the market effects of the AESO’s adequacy of supply metrics after the proposed rule changes.
2.	Do you agree or disagree with the potential objective or purpose of proposed amendments to Section 202.6? Please comment.	See above.
3.	Do you agree or disagree with the proposed form of consultation and timelines? Please comment.	No comment. The MSA does not intend to actively participate in this consultation.

Stakeholder Comment Matrix – January 5, 2021

Development of Proposed Amendments to Section 202.6 of the ISO rules, *Adequacy of Supply*  
("Section 202.6")



Development of a Proposed ISO Rule		Stakeholder Comments and/or Alternate Proposal
4.	Do you have any additional comments?	

## Stakeholder Comment Matrix – January 5, 2021

### Development of Proposed Amendments to Section 202.6 of the ISO rules, *Adequacy of Supply* (“Section 202.6”)



<p><b>Period of Comment:</b> January 5, 2021 through January 22, 2021</p> <p><b>Comments From:</b> Suncor Energy Inc.</p> <p><b>Date:</b> 2021/01/21</p>	<p><b>Contact:</b> Alexandra Dunlop</p> <p><b>Phone:</b> 403-540-0250</p> <p><b>Email:</b> aadunlop@suncor.com</p>
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***The AESO is seeking comments from Stakeholders on the development of proposed amendments to Section 202.6 of the ISO rules, Adequacy of Supply, with regard to the following matters:***

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1.	Do you agree or disagree that the issue identified requires the development of proposed amendments to Section 202.6? Please comment.	Suncor disagrees with the issue identified. The objective is stated to be red tape reduction but results in a decrease of market transparency. The detailed calculations in place for assessing supply adequacy help market participants to understand market conditions, and make decisions for their generation and load accordingly. Forecasting supply adequacy with no metrics will make it unclear for participants.



Development of a Proposed ISO Rule		Stakeholder Comments and/or Alternate Proposal
2.	Do you agree or disagree with the potential objective or purpose of proposed amendments to Section 202.6? Please comment.	<p>Suncor disagrees with the objective, as having detailed requirements for supply adequacy forecasts is essential to market transparency.</p> <p>Supply Adequacy Forecast: The AESO’s proposed amendments remove all detail of what goes into the adequacy forecast. Although the AESO has stated that to date they have not used the information when deciding on outage cancellations, they may do so in the future. It is insufficient to state that the AESO would expect to report on the situation to a level of detail that meets or exceeds the information provided in the daily supply adequacy reports in the rare event that a generation outage must be cancelled because of a supply adequacy shortfall. Further, market participants still rely on this information when making decisions for their own units.</p> <p>Short Term Adequacy Assessments: The AESO is proposing to remove the requirement of short-term adequacy assessments but still intends to continue publicly posting the report. While the AESO claims this assessment provides no value, market participants do see value in this report. However, without the details of how the AESO is determining their supply adequacy metric it will be very difficult for market participants to make decisions around the supply adequacy number the AESO is posting.</p> <p>Long Term Adequacy Metrics and Reporting: The AESO is proposing to remove all details of the Long Term Adequacy Reports. Market participants rely on this information when making decisions to bring generation and loads on or offline. As much market transparency as possible is required and this is moving in the wrong direction.</p>



Development of a Proposed ISO Rule		Stakeholder Comments and/or Alternate Proposal
3.	Do you agree or disagree with the proposed form of consultation and timelines? Please comment.	Suncor would like to see some discussion with market participants included in the consultations besides just the comment matrix so that the AESO is able to better understand the impact of these changes on market participants. For example, during the capacity market consultation, supply-cushion was determined to be a relevant real-time metric and market participants requested a supply-cushion report to be created. Suncor submits that instead of simply eliminating detail on reporting, it would be beneficial to instead consult with industry to create useful reports with as much detail available to industry as possible so that market participants can make informed decisions.
4.	Do you have any additional comments?	It is important to understand the purpose of red tape reduction. The goal is to simplify life for Albertans by eliminating administrative overhead and barriers. The AESO reducing available information is counterproductive as market participants will have to spend individual effort to recreate information that was formerly centrally available.  Further, removing details from the rule while maintaining the reports, as suggested by the AESO, serves no purpose and only introduces uncertainty.

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### Development of Proposed Amendments to Section 202.6 of the ISO rules, *Adequacy of Supply* (“Section 202.6”)



<b>Period of Comment:</b> January 5, 2021 through January 22, 2021	<b>Contact:</b> Akira Yamamoto
<b>Comments From:</b> TransAlta Corporation	<b>Phone:</b> 403-267-7304
<b>Date:</b> 2021/01/22	<b>Email:</b> akira_yamamoto@transalta.com

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("Section 202.6")



Development of a Proposed ISO Rule

Stakeholder Comments and/or Alternate Proposal





<p>1.</p>	<p>Do you agree or disagree that the issue identified requires the development of proposed amendments to Section 202.6? Please comment.</p>	<p><b><i>The supply adequacy forecast is used by participants to make unit commitment decisions that could impact system reliability</i></b></p> <p>TransAlta does not agree with the removal of the details of how it performs its Supply Adequacy Forecast. While it may be true that the AESO finds no value in producing the supply adequacy forecast or providing transparency in the way the supply adequacy forecast is developed, the forecast is used by market participants to make commitment decisions that could ultimately impact system reliability.</p> <p><b><i>The rule requirements should remain to ensure the Supply Adequacy Forecast is produced in accordance with a prescribed and transparent methodology</i></b></p> <p>The AESO states an issue that it is attempting to address is that the adequacy assessment methodology needs to be revised to consider certain inputs including removing the exclusion of wind and solar from the assessments. It is unclear how removing any obligation upon the AESO to consider these inputs through the entire removal of the requirement to perform adequacy assessments addresses this issue. In fact, the AESO, by removing any obligation upon itself to consider these inputs is relieving itself from any obligation to produce a better and more reliable adequacy assessment.</p> <p>Section 202.6 provides a clear and transparent methodology that the AESO must adhere to and obligation for it to perform these important assessments for market participants. This is precisely the detail and transparency required for market participant to understand and interpret the Supply Adequacy Forecast so that they can make rational market decisions that support the reliable operation of the system.</p> <p>The AESO should only make revisions to the rule that clarify how the inputs that need to be revised will be incorporated into the assessment. In any event, the AESO plans to continue to produce Supply Adequacy Forecasts so there is no real relief in terms of administrative burden with retaining the substance of the rule and amending the methodology to account for its deficiencies. The AESO should not pursue changes that eliminate its obligations to perform the assessment or specify the methodology that it must follow to perform these assessments.</p>
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	Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
2.	Do you agree or disagree with the potential objective or purpose of proposed amendments to Section 202.6? Please comment.	<p><b><i>The AESO’s duty to direct the reliable and economic operation of the system is not met if market participants are deprived important information to make self-commitment decisions</i></b></p> <p>An important feature of the Alberta market design is that generators must make self-commitment decisions. This is a significant and meaningful difference from other markets that have other mechanisms to address these such as through day ahead markets or scheduling process and Reliability Unit Commitment. We further note that even when there are other mechanisms to address unit commitment, ISOs still provide significant and detailed information to understand future period supply adequacy.</p> <p>No market participant wishes to make a self-commitment decision that could imperil the reliability of the system. The Supply Adequacy Forecast provides important information that informs a market participants decision with respect to shutting down long lead time assets in response to weak real time prices such that the potential consequences to system supply adequacy can be properly considered.</p>
3.	Do you agree or disagree with the proposed form of consultation and timelines? Please comment.	The proposed consultation (by way of written process) and timeline are reasonable.
4.	Do you have any additional comments?	<p><b><i>More transparency should be provided about what the Supply Adequacy Forecast assumes for price responsive load and long lead time assets</i></b></p> <p>TransAlta asks for more clarity about how price responsive loads are considered in the load forecasts as well as how long lead time assets are accounted for in the adequacy forecast. This information is needed to fully understand what the adequacy forecast is presenting and how changes in these parameters may affect the forecast result. It would be helpful if the AESO describes how the Supply Adequacy Forecast currently models these and describe any changes that it will make to these assumptions, if any.</p>

## Stakeholder Comment Matrix – January 5, 2021

### Development of Proposed Amendments to Section 202.6 of the ISO rules, *Adequacy of Supply* (“Section 202.6”)



**Period of Comment:** January 5, 2021 through January 22, 2021

**Comments From:** TransCanada Energy Ltd. (TCE)

**Date:** 2021/01/22

**Contact:** Mark Thompson

**Phone:** 403-589-7193

**Email:** markj\_thompson@tcenergy.com

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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 proposed amendments to Section 202.6? Please comment.	<p><i>In its Letter of Notice, the AESO identified the need to revise Rule 202.6 to address two issues: (i) to reconsider certain inputs in adequacy assessments including removing the exclusion of wind and solar from subsection 4(2)(b)(v); and (ii) to facilitate the AESO’s current red-tape reduction initiative.</i></p> <p><i>TCE agrees with removing the exclusion of wind and solar from subsection 4(2)(b)(v) now that renewables are a larger component of the supply mix in Alberta. As stated by the AESO, the reserve margin metric is a valuable metric for market participants. Knowing how the metric is calculated is similarly valuable as the result can change significantly depending on the assumptions and formula used. As such, TCE recommends that the AESO provide the formula and how it will incorporate wind and solar in an information document.</i></p> <p><i>TCE requests that the AESO confirm whether it intends to maintain the exclusion of wind and solar from subsection 4(2)(c)(v).</i></p> <p><i>TCE supports the red-tape reduction initiative, provided it leads to actual efficiency improvements and does not have the potential to negatively impact the FEOC operation of the market. Please see below for details as to whether the AESO’s proposed red-tape reduction amendments meet this condition.</i></p>



<p>2.</p>	<p>Do you agree or disagree with the potential objective or purpose of proposed amendments to Section 202.6? Please comment.</p>	<p><i>TCE supports some of the proposed amendments to Rule 202.6. However, TCE has concerns with, and thus does not support, some other of the proposed amendments.</i></p> <p><i>TCE supports the removal of detailed calculations in cases where the adequacy metric is merely provided to market participants and the results of the metric could not cause the AESO to intervene in the market. In these cases, the detailed calculations should be provided in an information document so that they are useful to market participants. Similarly, TCE would support the removal of requirements that are repetitive of existing legislation.</i></p> <p><i>However, TCE does not support the removal of the detailed calculations for an adequacy metric if the results of that metric could cause the AESO to intervene in the market. In such cases, removal of the detailed calculations would allow the AESO to unilaterally change the calculation in a manner that may negatively affect the FEOC operation of the market. In such cases, TCE submits that Commission oversight is required and the detailed calculations should remain within Rule 202.6. More detail is provided below.</i></p> <p><b>Subsection 2</b></p> <p><i>Subsection 2 requires that the AESO use a prescribed formula to assess supply adequacy in order to assist the AESO in determining whether to cancel a generation outage. The AESO proposes to remove the prescribed calculation on the basis that it uses an automated process to perform the calculation and that the calculation has not been relied upon to cancel an outage. With respect, the concern is that by removing the prescribed formula from Rule 202.6, the AESO may change the calculation without Commission oversight and rely upon it to cancel an outage. As such, this proposed amendment could impact the FEOC operation of the market. TCE does not support the proposed change to subsection 2.</i></p> <p><b>Current Subsection 3</b></p> <p><i>The AESO proposes to remove the entirety of the current subsection 3 on the basis that it does not align with how the AESO manages supply shortfall in real-time. Instead, the AESO states that it relies upon the requirements set out in Rule 202.2. However, subsection 2 of Rule 202.2 requires the AESO to manage a state of supply</i></p>
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Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
	<p><i>shortfall that may include issuing directives to generators or shedding firm load if a supply shortfall event is forecast pursuant to subsection 3 of Rule 202.6. As such, it is not clear to TCE how the AESO could remove this subsection without requiring commensurate amendments to Rule 202.2. TCE is not aware of any proposed amendments to Rule 202.2. Further, pursuant to Rule 202.2, subsection 3 of Rule 202.6 can directly impact the AESO’s intervention in the market. For these reasons, TCE does not support the removal of the current subsection 3 as currently proposed.</i></p> <p><b>Current Subsection 4</b></p> <p><i>TCE agrees with the AESO that the long-term adequacy metrics provide the market with valuable information and ought to be maintained. TCE supports the removal of the prescriptive assessment methodologies only for those metrics that cannot lead to market intervention on behalf of the AESO. For this reason, TCE does not support the proposed amendments to the current subsection 4(2)(d) (proposed subsection 3(2)(d)), which is relied upon by the AESO to determine the long-term adequacy threshold and to take long-term adequacy threshold actions pursuant to the current section 6 of Rule 202.6. As mentioned above, to the extent that calculation details are removed from Rule 202.6, they should be moved to an information document.</i></p> <p><b>Current Subsections 5 and 6</b></p> <p><i>TCE supports the minor amendments proposed in the current subsection 5 as they are minor and would not impact the FEOC operation of the market.</i></p> <p><b>Current Subsections 7 and 8</b></p> <p><i>TCE supports the proposed removal of the current subsection 7 for the reasons provided by the AESO.</i></p>

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Development of a Proposed ISO Rule		Stakeholder Comments and/or Alternate Proposal
3.	Do you agree or disagree with the proposed form of consultation and timelines? Please comment.	<i>The proposed form of consultation is reasonable subject to one modification. It appears that the AESO will only provide written responses to stakeholder comments after it receives comments on the final draft of the proposed amendments. TCE recommend that the AESO also provide written responses to the comments it receives on January 22, 2021 as this will for a better understanding of the AESO’s position and avoid repetition.</i>
4.	Do you have any additional comments?	<i>TCE has no further comments at this time.</i>