

Period of Comment: June 21, 2021 through July 12, 2021	Contact: Mark Thompson
Comments From: TransCanada Energy Ltd. (TCE)	Phone: 403-589-7193
Date: 2021/07/12	Email: markj_thompson@tcenergy.com

Instructions:

1. Please fill out the section above as indicated.
2. Please refer back to the “related material” on the Stakeholder Engagement page on the AESO website.
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 proposed development of administrative amendments to Section 201.6, with regard to the following matters:

Item	AESO Questions to Stakeholders	Stakeholder Comments
1.	Do you agree that the issue identified in the letter of notice requires the proposed development of administrative amendments to Section 201.6? If not, why not?	The issue identified is an intra-AESO issue. As such, TCE has no comment.
2.	Do you agree with the potential purpose of the proposed development of administrative amendments to Section 201.6? If not, why not?	The changes proposed to ISO Rule 201.6 appear to be consistent with the purpose.
3.	Do you agree with the proposed consultation and timelines? If not, why not?	TCE has no concerns with the proposed consultation and timelines.
4.	Do you agree with the proposed administrative amendments Section 201.6? If not, why not?	TCE does not object to the proposed changes.
5.	Do you agree that this should be submitted as an administrative amendment pursuant to AUC Rule 017? If not, why not?	At this point in time TCE would not object to the proposed changes being filed as an administrative amendment.
6.	Do you have any additional comments?	TCE notes that the current formula used to calculate the Reference Price is the same as it was when this rule was first implemented in 2007. The Reference Price is used to approximate the operating cost of unit providing TMR. However, the Reference Price does not include the cost of carbon. While this may have been appropriate in 2007, the carbon cost has increased significantly in the intervening period resulting in a Reference Price that no longer approximates a TMR unit’s operating costs and in an inefficient DDS market. TCE recommends that the AESO amend the Reference Price formula to include the applicable carbon price.