

Proposed Amendments to the Financial Settlement Rules

<p>Period of Comment: February 25, 2021 through March 18, 2021</p> <p>Comments From: ENMAX Corporation</p> <p>Date: 2021/03/17</p>	<p>Contact: Mark McGillivray</p> <p>Phone:</p> <p>Email: MMcGillivray@enmax.com</p>
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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.	See additional comments below.
2.	Do you agree or disagree with the potential purpose of the proposed amendments to the Financial Settlement Rules? Please comment.	See additional comments below.
3.	Do you agree or disagree with the proposed consultation and timelines? Please comment.	Agree.

	Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
4.	<p>Do you agree or disagree with the proposed amendments to the Financial Settlement Rules? Please comment.</p>	<p>ENMAX remains supportive of the AESO’s efforts to reduce and streamline regulatory requirements where stable practices and processes are not compromised as a result. ENMAX submits the following comments below.</p> <p>ISO Rule 103.4, Power Pool Financial Settlement</p> <p><u>Section 18, AESO Preliminary Power Pool Statements</u></p> <ul style="list-style-type: none"> - ENMAX requests further clarity from the AESO on the proposed removal of Section 18. Is it the AESO’s intention to no longer provide preliminary power pool statements to pool participants? We currently use the preliminary statements in our forecasts and validation efforts and do not believe this section should be removed. <p><u>Section 19, AESO Final Pool Settlement</u></p> <ul style="list-style-type: none"> - The AESO is proposing to remove the majority of Section 19. Stakeholders would benefit if this section provided clarity on what reasonable efforts will be used by the AESO to issue final power pool statements, and what options are available to stakeholders in the event they are unable to retrieve the final power pool statement from the AESO website (e.g., due to unforeseen technical issues). <p><u>NEW Subsection 18(7), Pool Settlement Date and Payment Obligations</u></p> <p><u>(7) The ISO may, notwithstanding subsection 18(4), withhold any payments to a pool participant such error is corrected by a pool participant to the satisfaction of the ISO, if the ISO determines there is an error in the metering data as a result of the pool participant’s failure to comply with applicable laws requirements relating to metering.</u></p> <ul style="list-style-type: none"> - Can the AESO please advise whether the withholding of payments will apply only to specific hours impacted by a metering data error or for all hours in the settlement month? In ENMAX’s view, withholding of payments should only apply to specific hours impacted by a metering data error. <p><u>Section 23, Payment and Section 24, Repayment Procedures</u></p> <ul style="list-style-type: none"> - The specific payment methods to the ISO “by wire transfer” is being removed and replaced with “in the manner the ISO specifies”. Unless we are notified otherwise, ENMAX assumes that the current method it uses to pay the AESO remains acceptable.
5.	<p>Do you have any additional comments?</p>	