

March 10, 2021

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

Re: **Alberta Electric System Operator Reply to Stakeholder Comments – Administrative Amendments to Section 304.3 of the ISO rules, *Wind and Solar Power Ramp Up Management* (“Section 304.3”)**

On February 11, 2021, the Alberta Electric System Operator (“AESO”) issued a Letter of Notice notifying Stakeholders of its proposed administrative amendments to Section 304.3 and requesting Stakeholder comments on the proposed amendments. In response to the AESO’s request, ENMAX Energy Corporation (“EEC”) submitted comments to the AESO.

### **AESO Replies to Stakeholder Comments**

In accordance with Section 11.3 of Alberta Utilities Commission (“AUC”) Rule 017, *Procedures and Process for Development of ISO Rules and Filing of ISO Rules with the Alberta Utilities Commission*, the AESO is providing replies to Stakeholder comments below.

EEC agreed with the issues identified in the Letter of Notice and the proposed consultation process and timelines. However, EEC had a question about the wording that will appear on the exemption list, including the list of facilities that will be exempt. Section 304.3 is applicable to legal owners and operators of wind or solar aggregated generating facilities that meet the criteria set out in subsection 1(1)(a) or (b) of Section 304.3 and that were energized and commissioned after April 7, 2017 unless exempted by the AESO. In order to streamline the Applicability section, the AESO intends to include any exempt facilities in an exemption list. At this time, Bull Creek #1 and Bull Creek #2 will be the only facilities in the exemption list. The AESO anticipates posting the list in ID #2018-013 Wind and Solar Power Ramp Up Management.

EEC also requested more information on why subsection 4 of Section 304.3 is being removed. As part of the Government of Alberta’s Red Tape initiative, the AESO is currently reviewing its authoritative documents to remove duplicative and unnecessary requirements, as well as to consolidate and streamline repetitive provisions. Subsection 4 of Section 304.3 requires the ISO to implement the energy market merit order provisions of the ISO rules for managing ramp up of the total real power output from all wind or solar aggregated generating facilities. The AESO considers subsection 4 to be redundant as the AESO’s duties in that regard are sufficiently addressed in Section 203.2 of the ISO rules, *Issuing Dispatches for Energy*. The AESO would like to confirm that there is no change to the AESO’s implementation of the energy market merit order provisions.

### **Application for Approval of the Proposed Amended Section 304.3**

Pursuant to Section 12.1 of the AUC Rule 017, the AESO expects to submit its application for approval of the proposed amended Section 304.3 to the AUC in March of 2021.

If you have any questions, please submit them to [rules\\_comments@aeso.ca](mailto:rules_comments@aeso.ca).

Sincerely,

*Jodi Marshall*

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