



<p><b>Period of Comment:</b> October 26, 2020 through November 9, 2020</p> <p><b>Comments From:</b> TransCanada Energy Ltd. (TCE)</p> <p><b>Date:</b> 2020/11/09</p>	<p><b>Contact:</b> Mark Thompson</p> <p><b>Phone:</b> 403-589-7193</p> <p><b>Email:</b> markj_thompson@tcenergy.com</p>
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**Instructions:**

1. Please fill out the section above as indicated.
2. Please refer back to the *Letter of Notice for Feedback on the Content of Proposed Options for Amended Section 505.2* under the “Related Materials” section to view the actual draft proposed materials on amended Section 505.2.
3. Please respond to the questions below and provide your specific comments, proposed revisions, and reasons for your position underneath (if any). Blank boxes will be interpreted as favourable comments.
4. Please be advised that general comments do not give the AESO any specific issue to consider and address, and results in a general response.

Item #		Stakeholder comments
1	Please comment on the stakeholder session hosted on October 8, 2020. Was the session valuable? Was there something the AESO could have done to make the session more helpful?	TCE appreciates the effort involved in hosting stakeholder sessions and finds stakeholder sessions to be an extremely valuable component of the ISO Rule process.
2	Which option do you prefer and why?	TCE prefers Option 2 for several reasons. One reason is that the Option 2 performance assessment is consistent between all generation types. Option 1 will provide significantly different Generating Unit Owner’s Contribution (GUOC) refunds to different generation types of the same size, same location, and same availability even though the same GUOC payments were assessed. Another reason is that Option 1 would result in lower GUOC refunds relative to the current rule even if a developer provided accurate

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		<p>maximum capability information to the AESO. Further, Option 1 may penalize a generator for a force majeure event. More detail on each of these issues is provided in TCE's Option 1 comments.</p> <p>In addition, Option 1 may need a grandfathering provision for existing generators still within their 10-year GUOC refund term. Overall, Option 2 provides a simple and consistent framework that can, with some minor amendments, create the incentives for developers to provide the AESO with the best available information.</p>
3	Do you have any concerns with the option you chose?	TCE has some concerns with Option 2 that can be remedied with further clarification and minor amendments. Please refer to TCE's Option 2 comments.
4	Do you have any concerns with the option you did not choose?	Yes, TCE has some significant concerns with Option 1. Please refer to TCE's Option 1 comments.
5	Any additional comments regarding the proposed amended Section 505.2?	TCE recommends further consultation on this issue, particularly if the AESO decides to proceed with Option 1.

***Please provide any additional comments or views on the type of content that should be included in an information document associated with the proposed amended Section 505.2***