Stakeholder Comment Matrix – October 26, 2020

Draft Proposed Amended Section 505.2 of the ISO Rules, *Performance Criteria for Refund of Generating Unit Owner's Contribution* ("Section 505.2") – Option 2 Draft Rule Language

Period of Comment:	October 26, 2020	through	November 9, 2020	**Contact:**	Jordan Balaban
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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. **On the sections of the rule listed below, please 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.**

Question	Stakeholder Comments
Refund of Generating Unit Owner's Contribution	
2 The **ISO** must calculate a refund for each calendar year during the refund period as follows: $\text{refund} = (\text{annual amount x availability}) \text{ x } (1 - \text{penalty factor})$ where: (a) annual amount is as specified in the **ISO tariff**;	Greengate agrees with and strongly supports this second alternative.

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Question	Stakeholder Comments
(b) availability is the availability factor assessed for the calendar year in accordance with subsection 3(1); and (c) penalty factor is the penalty factor calculated for the calendar year in accordance with subsection 3(2).	
Performance Assessment	
3(1) The **ISO** must assess the availability of a **generating unit** or **aggregated generating facility** as follows: (a) if the **revenue meter** of the **generating unit** or **aggregated generating facility** recorded metered energy in a **settlement interval** during the previous calendar year, availability factor is 100%; (b) if the **revenue meter** of the **generating unit** or **aggregated generating facility** recorded zero metered energy in all **settlement intervals** during the previous calendar year, availability factor is 0%.	Greengate appreciates and strongly agrees with this proposed option 2 change to the assessment for availability.
(2) If the **maximum capability** of the **generating unit** or **aggregated generating facility** on the first day of each calendar year during the refund period is less than its critical **maximum capability**, the **ISO** must assess a penalty factor as follows: $$\text{penalty factor} = \frac{\text{ABS}(\text{critical maximum capability} - \text{energized maximum capability})}{\text{critical maximum capability}}$$ where:	For solar units the MC may be defined by the STS level of the facility. If the STS level changes or increases in the future, then the MC level will also be modified. Given that, it likely beneficial to specify in (a)i) that the current or most recent STS agreement will be used in determining the critical maximum capability. It is also likely helpful to have a grace area around the MC since the actual MC level is theoretical until the unit operates. Perhaps a 10% variance around the MC would be helpful in ensuring that Market Participants are not harmed with equipment operating at ranges slightly different than design.

Question	Stakeholder Comments
(a) critical maximum capability is (i) the **maximum capability** of the **generating unit** or **aggregated generating facility** at the time the Rate STS system access service agreement is effective; or (ii) energized **maximum capability** as defined in subsection 3(2)(b), if there is no change in Rate STS at the point of supply; and (b) energized **maximum capability** is the **maximum capability** of the **generating unit** or **aggregated generating facility** following energization and **commissioning**.	
Preliminary Refund Assessment	
4 The **ISO** must provide a preliminary refund assessment, along with relevant input data, to the **legal owner** of a **generating unit** or an **aggregated generating facility** by January 31 of the year following the calendar year to which the refund relates.	