

ISO Rule Proposal



Purpose of the Form

Section 20.81 of the *Electric Utilities Act* requires the AESO to establish a process for market participants and interested parties to propose ISO rules for the AESO's consideration. To propose a new ISO rule, an amendment to an existing ISO rule or a removal of an existing ISO rule, please complete and submit this form.

Completed proposal forms will be posted to the AESO website with Individual Name, Title and Contact Details removed. Please ensure that any confidential or commercially sensitive information submitted with your proposal has been clearly identified.

ISO Rule Proposal Description

1. Proposal Date: October 9, 2018

2. Proposal Type:

<input type="checkbox"/> New ISO rule(s)	<input checked="" type="checkbox"/> Amend existing ISO rule(s)	<input type="checkbox"/> Removal of existing ISO rule(s)
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3. Provide a concise description of the issue that the proposed rule is intended to address, the level of urgency, and any industry impacts. Please provide a list of any relevant supporting data, analysis, or materials and include these documents as attachments to this form.

As written, Section 203.3 of the ISO Rules, *Energy Restatements*, does not take *importer* activity into account, but rather, is focused on traditional generator services. The rule was written to require generators to notify the balancing authority by updating the schedule in a timely manner, so that the balancing authority (i.e. AESO) will know what volumes are being supplied to the pool in any given hour. In the event that a generator experiences operating difficulties and is not able to deliver scheduled power, then the generator should be adjusting its schedule to reflect these changes so that the balancing authority has the necessary information readily available. In this scenario, it makes perfect sense that the AESO would need this information in a timely manner.

However, we believe the AESO is misapplying this requirement in the case of *importers* in instances when those entities receive the Available Transfer Capability restatement allocations directly from the balancing authority. In such cases, it is the AESO itself that is first aware of the adjustment, and then makes the importer aware of the change. In light of this, any citations addressed to the importer, for failure to adjust the schedule in a timely manner seem to go against our understanding of the original intent of the requirement.

4. Provide a description of your proposal to address the issue described in #3. Include the purpose or objective of the proposed new or amended ISO rule. Note that it is not necessary to provide draft rule language.

We believe that Section 203.6 and Section 203.3 should either be clarified or amended to specify that while schedules must be adjusted in a timely manner so that the AESO is made aware of volumes being supplied to the pool, in cases where the *importers* receive the Available Transfer Capability restatement allocations directly from the AESO, or curtailment of E-tags directly by the AESO post T-20, the balancing authority is sufficiently equipped with the necessary restatement information; and therefore, in these cases restatement of the schedule would not be required. Alternatively, we believe the AESO should update its software to allow importers to employ automated solutions to review all schedules for adjustments. This would alleviate manual adjustments, and prompt timely response to ATC messages.

5. Provide a list of related ISO rules, Information Documents, and any other relevant AESO documents.

Section 203.3 of the ISO Rules, *Energy Restatements*

Section 203.6 of the ISO Rules, *Available Transfer Capability and Transfer Path Management*