

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:

June 21, 2021

2. Proposal Type:

<input checked="" type="checkbox"/> New ISO rule(s)	<input 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.

Alberta market prices have never been historically higher than they are to date in 2021. IPCAA submits that a component of the increase in pool price has been the marked increase in generators' commercially offline decisions since January 1, 2021.

On January 27, 2021, in a letter to the AESO and MSA, IPCAA requested the release of the long-lead time status of coal-fired and coal-to-gas conversion-fired generators. In its reply letter of February 23, 2021, the AESO stated that *"The AESO remains committed to following its reporting requirements in accordance with the FEOC Regulation."* The AESO also stated that *"its current outage and long-lead time reporting practices are consistent with the FEOC Regulation."*

IPCAA began to monitor the outage and unit availability data to better understand the commercial decisions made by Alberta generators. It has become apparent from watching the AESO's seven-day hourly available capability report and the Daily Outage report that it is impossible to accurately predict the number of MWs under LLTE. The two reports provide inconsistent results. IPCAA is concerned that the AESO is providing unreliable and misleading records to the electricity markets.

The following table provides three examples of LLTE generation inconsistencies and are just a few examples of the inaccuracy between the methodologies to discern the MWs on LLTE.

Date of Analysis	LLTE Hour	LLTE Calculated From 7 Day Hourly Availability	LLTE Calculated From Outage Report
March 30 @ 9:31	March 30 HE 19	921 MW	697 MW
June 4 @ 10:08	June 4 HE 17	-407 MW	-238 MW
June 10 @ 13:43	June 10 HE 17	459 MW	756 MW

Table 1: Examples of LLTE Calculations with data extracted from the AESO published reports

In two of the instances, it was impossible to understand whether it was two or three units on LLTE and in once case there was a negative LLTE generator off-line.

These are just a few examples of the inconsistencies observed over the past three months of monitoring the data. In the February 23 letter, the MSA indicated they would be reporting on the LLTE data and IPCAA believes the MSA will also be seeing the same inconsistencies. This inconsistent and misleading outage records data is a significant concern.

Based on the published data, the only entities who can understand their commercially offline decisions are the firms who own and operate these units and thus have an asymmetric outage knowledge advantage.

Providing an AESO-generated LLTE report will ensure consistency on the outage records available to all market participants.

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.

IPCAA is proposing that the AESO publish a table of the number of MWs on LLTE for the next 36 hours on an hourly basis. IPCAA is proposing the AESO would aggregate the data to ensure that a specific LLTE generator could not be identified.

The purpose of this proposal is to provide a transparent consistent view of the number of MW's on long-lead time. So that load and other can understand the commercial decisions that are being made by the major firms.

IPCAA has provided a Draft Rule as an attachment.

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

Fair, Efficient and Open Competition Regulation (FEOC)

Section 306.5 Generation Outage Reporting and Coordination

Section 306.3 Load Planned Outage Reporting

Proponent Information

List at least one contact. For additional contacts, copy the table below and include all the requested details for each person. If more than one contact is provided, please identify the main contact.

Individual Name:	Richard Penn
Title:	Senior Regulatory Analyst - IPCAA
Company Name:	Industrial Power Consumers Association of Alberta
Contact details:	Richard.penn@ipcaa.ca 403-903-7693

Note that personal information collected on this form will be used to contact you to administer the ISO rule proposal process. This information is collected in accordance with section 33(c) of the *Freedom of Information and Protection of Privacy Act*. Questions related to the handling of personal information can be directed to privacy@aeso.ca.

Submit form to: ruleproposals@aeso.ca

Long Lead Time Reporting - Proposed Market Rule

Applicability

Section XXXX applies to:

- (a) The ISO

Requirements

(1) Subsequent to the **ISO** receiving from **market participants** the submissions referred to in Section 202.4 *Managing Long Lead Time Assets*, on each hour of a day the **ISO** must aggregate all **Long Lead Time** records for generators as submitted, and determine the aggregate hourly **planned Long Lead Time Energy (LLTE)** in MW which the **ISO** will calculate as:

- the sum of MWh of all submitted **LLTE** by time period for each of the following 36 hours

(2) Once the **ISO** has determined the aggregate hourly **planned LLTE** under subsection (1), the **ISO** must also prepare an hourly **planned LLTE** report and publish it each **hour** on the AESO website. This **planned LLTE** report must include:

- (a) the time and date the report was prepared; and
- (b) the hourly **planned LLTE** amount in MW, rounded to the nearest MW, for each **hour** of the next 36 successive **hours**.

(3) Subject to subsection 2(8), the **ISO** must keep confidential all **planned outage** information for generators who submitted to it under this Section 306.3, except as otherwise required to be made public under the provisions of Section 103.1 of the **ISO rules**, *Confidentiality*.

(4) The **ISO** must publish on the AESO website the aggregate hourly **planned LLTE** report in a manner that, in accordance with Section 103.1 of the **ISO rules**, *Confidentiality*, seeks to preserve the confidential nature of any **planned LLTE** information as submitted by any one **market participant**, and precludes the identification of any one **market participant**, or other directly affected **pool participant**.