

June 7, 2018

Email: capacitymarket@auc.ab.ca

Alberta Utilities Commission
Eau Claire Tower
1400, 600 Third Avenue S.W.
Calgary, AB T2P 0G5

Attention: Kevin Thompson

Dear Mr. Thompson:

Re: AltaLink Management Ltd. Comments – AUC Rule 017 Stakeholder Consultation

Please consider the following letter AltaLink's written comments for the initial stakeholder consultation regarding draft AUC Rule 017. As a result of a technical issue with AltaLink's email system receiving emails from the AUC notification system, AltaLink only recently became aware of the stakeholder consultation process for the draft Rule 017. AltaLink intends to participate in the consultation process. AltaLink has reviewed all information on the AUC website with regards to the draft Rule 017, including the presentation slides and the Stakeholder Consultation Meeting Summary.

AltaLink agrees and shares the concerns raised in the following comments found in the meeting summary:

- The rule should have a greater level of detail respecting the ISO's obligation to make comments received from interested parties available publicly for all parties to see;
- Concerns that the language in the proposed rule (particularly stating that an 'application should include') lessens the information requirements and steps away from the requirement of building a complete record;
- Concerns regarding increased regulatory burden: incentive for collaboration during consultation between ISO and stakeholders may vanish if the AUC insists on rehashing processes and content. Without the opportunity for a collaborative process, like a negotiated settlement, what is the incentive?;
- ISO receives comments from market participants, but there is no requirement for a response. It is particularly important to address comments from the MSA;
- To increase regulatory efficiency, consultations should have formal weight so that things cannot be challenged from the ground up;
- When market participants engage the ISO when the participant believes a new rule or change is needed, the ISO should be obligated to provide a fair minded and robust set of reasons if the ISO decides not to pursue the proposal further;
- Following documentation of ISO consultation with the AUC, there should be a defined opportunity that allows market participants to challenge or add to the written record to fully reflect what market participants thought was relevant during the consultation;
- Concerns regarding the lack of an unbiased adjudicator during an ISO consultation and potentially lengthiness of the consultation; and
- Stakeholders would like to receive notice from the ISO if the ISO finds an issue that requires an expedited rule.

AltaLink submits the following comments that do not seem to be captured in the meeting minutes:

- There needs to be established timelines for notifications, consultation process, the submission of the application and the AUC determination/order to help ensure an efficient and timely process; and
- Further clarity around technical working groups and the resulting rule development coming from those technical working group meetings. Specifically, when does consultation requirements for technical rules commence and who needs to be consulted (is the MSA consulted)? Additionally, does all documentation from those existing technical working groups form part of the analysis/documentation for the ISO submissions to the AUC?

Based on AltaLink's review of the meeting summary and the concerns raised by stakeholders and AltaLink's only recent awareness of the consultation process for the draft AUC Rule 017 as a result of a technical issue, AltaLink submits that there is a need for a second stakeholder consultation meeting and further comment period. AltaLink is prepared to attend the second stakeholder consultation meeting as provisionally scheduled on June 26, 2018.

Yours truly,

(Original signed by)

Rob Senko
Director, Regulatory Economics Policy