

AUC Rule 017: Stakeholder comment matrix

Please provide comments relating to the subsection of the rule in the corresponding box. If you have proposed language changes, please make the changes under the “proposed changes” column with tracked changes on (they are on by default).

Comments of the Utilities Consumer Advocate July 6, 2018

Section	Subsection	Existing	Proposed changes	Stakeholder comment	AUC staff response
		Part 1: General matters	Part 1: General matters		
1	1.1	Definitions The definitions from the <i>Electric Utilities Act</i> apply to these rules.	Definitions The definitions from the <i>Electric Utilities Act</i> apply to these rules.		
1	1.2	In these rules: (a) “ISO” means the Independent System Operator. (b) “ISO rule” means a rule made by the ISO under its authority in the <i>Electric Utilities Act</i> that: i. has been approved by the Commission after August 1, 2018; or ii. was made by the ISO before August 1, 2018 and has not been amended or removed on or after August 1, 2018.	In these rules: (a) “ISO” means the Independent System Operator. (b) “ISO rule” means a rule made by the ISO under its authority in the <i>Electric Utilities Act</i> that: i. has been approved by the Commission after August 1, 2018; or ii. was made by the ISO before August 1, 2018 and has not been amended or removed on or after August 1, 2018.		
		Part 2: Procedures and process for development of proposed rules and application for Commission approval	Part 2: Procedures and process for development of proposed rules and application for Commission approval		
2	2.1	Definitions In this Part: (a) “proposed rule” means a proposed new ISO rule, a proposed amendment to an existing ISO rule, a proposed removal of an existing ISO rule, or a renewal of an existing ISO rule that has a fixed term.	Definitions In this Part: (a) “proposed rule” means a proposed new ISO rule, a proposed amendment to an existing ISO rule, a proposed removal of an existing ISO rule, or a renewal of an existing ISO rule that has a fixed term.		

Section	Subsection	Existing	Proposed changes	Stakeholder comment	AUC staff response
3	3.1	<p>Application</p> <p>This Part does not apply to proposed provisional rules or proposed initial rules as those terms are defined in Part 3.</p>	<p>Application</p> <p>This Part does not apply to proposed provisional rules or proposed initial rules as those terms are defined in Part 3.</p>		
4	4.1	<p>Notice for development of proposed rules</p> <p>When the ISO identifies an issue, or receives a complete proposal pursuant to its process under Section 20.81 of the <i>Electric Utilities Act</i>, that, in the opinion of the ISO, may require a proposed rule, the ISO must issue written notice to the Market Surveillance Administrator, market participants, and other interested parties prior to developing a proposed rule and must post the notice on the ISO's website.</p>	<p>Notice for development of proposed rules</p> <p>When the ISO identifies an issue, or receives a complete proposal pursuant to its process under Section 20.81 of the <i>Electric Utilities Act</i>, that, in the opinion of the ISO, may require a proposed rule, the ISO must issue written notice to the Market Surveillance Administrator, market participants, and other interested parties prior to developing a proposed rule and must post the notice on the ISO's website.</p>		
4	4.2	<p>If the notice is required because of receipt of a complete proposal received by the ISO pursuant to its process under Section 20.81 of the <i>Electric Utilities Act</i>, the ISO must issue notice within 30 days of receipt of the complete proposal.</p>	<p>If the notice is required because of receipt of a complete proposal received by the ISO pursuant to its process under Section 20.81 of the <i>Electric Utilities Act</i>, the ISO must issue notice within 30 days of receipt of the complete proposal.</p>		
4	4.3	<p>The notice must set out:</p> <ul style="list-style-type: none"> (a) the issue that a proposed rule is intended to address; (b) a description of the potential objective or purpose of the proposed rule; (c) the manner in which the Market Surveillance Administrator, market participants, and other interested parties may submit: <ul style="list-style-type: none"> (i) written comments; (ii) a notice of intent to participate in consultation; and (iii) comments on the form of consultation; (d) the deadline date for comments, which must not be less than 15 days from the later of: <ul style="list-style-type: none"> (i) the date the notice is issued to the Market Surveillance Administrator, market participants, and other interested parties; or (ii) the date the notice is issued on the ISO's website; and (e) where the information set out in subsection 4.4 can be accessed. 	<p>The notice must set out:</p> <ul style="list-style-type: none"> (a) the issue that a proposed rule is intended to address; (b) a description of the potential objective or purpose of the proposed rule; (c) the manner in which the Market Surveillance Administrator, market participants, and other interested parties may submit: <ul style="list-style-type: none"> (i) written comments; (ii) a notice of intent to participate in consultation; and (iii) comments on the form of consultation; (d) the deadline date for comments, which must not be less than 15 days from the later of: <ul style="list-style-type: none"> (i) the date the notice is issued to the Market Surveillance Administrator, market participants, and other interested parties; or (ii) the date the notice is issued on the ISO's website; and (e) where the information set out in subsection 4.4 can be accessed. 		

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4	4.4	When the notice is posted on the ISO's website, the ISO must also post a copy of any material the ISO considers to be relevant that is related to the need for, the development of, removal of, or renewal of the proposed rule.	When the notice is posted on the ISO's website, the ISO must also post a copy of any material the ISO considers to be relevant that is related to the need for, the development of, removal of, or renewal of the proposed rule.		
5	5.1	<p>Comments</p> <p>The Market Surveillance Administrator, market participants, and interested parties may:</p> <ul style="list-style-type: none"> (a) provide general written comments to the ISO on the need for, the development of, removal of, or renewal of a proposed rule; (b) submit a notice of intent to participate in consultation with the ISO; and (c) comment on the form of consultation. 	<p>Comments</p> <p>The Market Surveillance Administrator, market participants, and interested parties may:</p> <ul style="list-style-type: none"> (a) provide general written comments to the ISO on the need for, the development of, removal of, or renewal of a proposed rule; (b) submit a notice of intent to participate in consultation with the ISO; and (c) comment on the form of consultation. 		
5	5.2	<p>Within 5 business days of receipt of comments, the ISO must:</p> <ul style="list-style-type: none"> (a) post all submissions received pursuant to subsection 5.1 on the ISO's website; and (b) provide written notice to the Market Surveillance Administrator, market participants and other interested parties regarding where the information set out in subsection 5.2(a) can be accessed. 	<p>Within 5 business days of receipt of comments, the ISO must:</p> <ul style="list-style-type: none"> (a) post all submissions received pursuant to subsection 5.1 on the ISO's website; and (b) provide written notice to the Market Surveillance Administrator, market participants and other interested parties regarding where the information set out in subsection 5.2(a) can be accessed. 		
6	6.1	<p>Consultation for development of proposed rules</p> <p>Upon receipt of any notice of intent to participate in consultation, the ISO must:</p> <ul style="list-style-type: none"> (a) form a consultation group or consultation groups composed of any parties; <ul style="list-style-type: none"> (i) who submitted a notice of intent to participate in consultation; or (ii) that the ISO thinks may be directly affected by the proposed rule; (b) consult with the consultation group(s) in a manner determined by the ISO to: <ul style="list-style-type: none"> (i) determine the need for a proposed rule; and 	<p>Consultation for development of proposed rules</p> <p>Upon receipt of any notice of intent to participate in consultation, the ISO must:</p> <ul style="list-style-type: none"> (a) form a consultation group or consultation groups composed of any parties; <ul style="list-style-type: none"> (i) who submitted a notice of intent to participate in consultation; and (ii) that the ISO thinks may be directly affected by the proposed rule; (b) consult with the consultation group(s) in a manner determined by the ISO to: <ul style="list-style-type: none"> (i) determine the need for a proposed rule; and 	<p>Replace or in 6.1(a)(i) with the word and</p>	

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		(ii) develop a proposed rule if, in the opinion of the ISO a proposed rule is necessary.	(ii) develop a proposed rule if, in the opinion of the ISO a proposed rule is necessary.		
6	6.2	When the ISO undertakes consultation with a consultation group or consultation groups under subsection 6.1, the ISO must provide an opportunity for members of the consultation group(s) to make submissions regarding the information required in subsections 7.2(b) through 7.2(i) of this rule.	When the ISO undertakes consultation with a consultation group or consultation groups under subsection 6.1, the ISO must provide an opportunity for members of the consultation group(s) to make submissions regarding the information required in subsections 7.2(b) through 7.2(i) of this rule.		
6	6.3	Following development of a proposed rule, the ISO must provide written notice to the Market Surveillance Administrator, market participants and other interested parties and solicit comments on the proposed rule by way of a: (a) proposed rule comment matrix; and (b) request for comment on whether the proposed rule is technically deficient.	Following development of a proposed rule, the ISO must provide written notice to the Market Surveillance Administrator, market participants and other interested parties and solicit comments on the proposed rule by way of a: (a) proposed rule comment matrix; and (b) request for comment on whether the proposed rule is technically deficient.		
6	6.4	The notice required by subsection 6.3 must: (a) be posted on the ISO's website; (b) include the information required by subsection 4.3, excluding the requirement in subsection 4.3(c)(ii) and 4.3(c)(iii); and (c) include the information required by subsection 4.4.	The notice required by subsection 6.3 must: (a) be posted on the ISO's website; (b) include the information required by subsection 4.3, excluding the requirement in subsection 4.3(c)(ii) and 4.3(c)(iii); and (c) include the information required by subsection 4.4.		
6	6.5	Within 5 business days of receipt of comments received pursuant to subsection 6.3, the ISO must: (a) post all submissions on the ISO's website; and (b) provide written notice to the Market Surveillance Administrator, market participants and other interested parties regarding where the submissions referred to in subsection 6.5(a) can be accessed.	Within 5 business days of receipt of comments received pursuant to subsection 6.3, the ISO must: (a) post all submissions on the ISO's website; and (b) provide written notice to the Market Surveillance Administrator, market participants and other interested parties regarding where the submissions referred to in subsection 6.5(a) can be accessed.	The UCA submits that the stakeholder comment process would be significantly enhanced by requiring the AESO to reply to all comments received during consultation accompanied by an explanation as to why the positions/suggestions were accepted or rejected. This would reduce repetition of comments and questions, provide clarity on positions and establish a complete record of options explored.	
6	6.6	After consulting under Section 6, the ISO may proceed to make an application to the Commission under Section 7.	After consulting under Section 6, the ISO may proceed to make an application to the Commission under Section 7.		

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7	7.1	<p>Application for Commission approval of proposed rules</p> <p>The ISO must apply to the Commission for approval of a proposed rule.</p>	<p>Application for Commission approval of proposed rules</p> <p>The ISO must apply to the Commission for approval of a proposed rule.</p>		
7	7.2	<p>Subject to subsection 7.3, an application for approval of a proposed rule must include the following information:</p> <ul style="list-style-type: none"> (a) a description of the consultation process that was undertaken by the ISO including a list of parties who participated and copies of any submissions made by parties under subsections 6.2 and 6.3; (b) an explanation of whether the proposed rule relates to the capacity market and why; (c) if the proposed rule relates to the capacity market, an explanation of whether or not the proposed rule will be in effect for a fixed term and why; (d) a description of the objective or purpose of the proposed rule; (e) a copy of any analysis conducted or commissioned by the ISO supporting the proposed rule, with a description of assumptions and methodology; (f) an explanation of why the proposed rule, taken together with all ISO rules and in light of the principle of a fair, efficient and openly competitive market, was proposed; (g) a description of any alternatives that were explored during consultation and an explanation as to why they were rejected; (h) if the rule relates to the capacity market, a description of how the proposed rule supports ensuring a reliable supply of electricity at a reasonable cost to customers; and (i) an explanation of how the proposed rule supports the public interest. 	<p>Subject to subsection 7.3, an application for approval of a proposed rule must include the following information:</p> <ul style="list-style-type: none"> (a) a description of the consultation process that was undertaken by the ISO including a list of parties who participated and copies of any submissions made by parties under subsections 6.2 and 6.3; (b) an explanation of whether the proposed rule relates to the capacity market and why; (c) if the proposed rule relates to the capacity market, an explanation of whether or not the proposed rule will be in effect for a fixed term and why; (d) a description of the objective or purpose of the proposed rule; (e) a copy of any analysis conducted or commissioned by the ISO supporting the proposed rule, with a description of assumptions and methodology; (f) an explanation of why the proposed rule, taken together with all ISO rules and in light of the principle of a fair, efficient and openly competitive market, was proposed; (g) a description of any alternatives that were explored during consultation and an explanation as to why they were rejected; (h) if the rule relates to the capacity market, a description of how the proposed rule supports ensuring a reliable supply of electricity at a <u>reasonable cost to customers</u>; and (i) an explanation of how the proposed rule supports the <u>public interest</u>. 	<p>Entire section 7.2 – Bill 13 differentiates between two markets, capacity and electricity, when accessing ISO Rules the AUC must keep in mind that the two markets are intertwined. A small change in one could have large impacts in the other. Therefore the public interest may not be served by looking at the impacts in only one of the markets at a time. The same reasoning may apply to ensuring a reliable supply of electricity at a reasonable cost to customers. As such, the application for approval of a proposed rule must explain how the proposed rule applies to the entire market not simply the capacity market.</p> <p>It was suggested that positive language be added within Rule 017 stating that investors should be provided with the opportunity to recover their fixed costs and a return on investments. While we are in favour of investors being provided with the opportunity to recover fixed costs and a return on investments the UCA does not favour having language enshrined in the rule.</p>	
7	7.3	<p>In the event that any of the information set out in subsection 7.2 is not included in the application, the ISO must provide an explanation for not doing so.</p>	<p>In the event that any of the information set out in subsection 7.2 is not included in the application, the ISO must provide an explanation for not doing so.</p>		

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		<p>Part 3: Procedures and process for development of proposed provisional rules and proposed initial rules and application for Commission approval</p>	<p>Part 3: Procedures and process for development of proposed provisional rules and proposed initial rules and application for Commission approval</p>		
8	8.1	<p>Definitions</p> <p>In this Part:</p> <p>(a) “proposed initial rule” means a proposed new ISO rule, a proposed amendment to an existing ISO rule, a proposed removal of an existing ISO rule, or a renewal of an existing ISO rule that has a fixed term that:</p> <ul style="list-style-type: none"> (i) has received provisional approval from the Commission under Section 20.22 of the <i>Electric Utilities Act</i>; or (ii) has not received provisional approval from the Commission under Section 20.22 of the <i>Electric Utilities Act</i> and was: <ul style="list-style-type: none"> 1. directed by the Commission to be considered under Section 20.22 of the <i>Electric Utilities Act</i> pursuant to Section 20.22(4)(c) of the <i>Electric Utilities Act</i>; or 2. developed by the ISO pursuant to Section 41.42(1) of the <i>Electric Utilities Act</i>. <p>(b) “proposed provisional rule” means a proposed new ISO rule, a proposed amendment to an existing ISO rule, or a proposed removal of an existing ISO rule that is developed by the ISO pursuant to Section 41.42(3) of the <i>Electric Utilities Act</i>.</p>	<p>Definitions</p> <p>In this Part:</p> <p>(a) “proposed initial rule” means a proposed new ISO rule, a proposed amendment to an existing ISO rule, a proposed removal of an existing ISO rule, or a renewal of an existing ISO rule that has a fixed term that:</p> <ul style="list-style-type: none"> (i) has received provisional approval from the Commission under Section 20.22 of the <i>Electric Utilities Act</i>; or (ii) has not received provisional approval from the Commission under Section 20.22 of the <i>Electric Utilities Act</i> and was: <ul style="list-style-type: none"> 1. directed by the Commission to be considered under Section 20.22 of the <i>Electric Utilities Act</i> pursuant to Section 20.22(4)(c) of the <i>Electric Utilities Act</i>; or 2. developed by the ISO pursuant to Section 41.42(1) of the <i>Electric Utilities Act</i>. <p>(b) “proposed provisional rule” means a proposed new ISO rule, a proposed amendment to an existing ISO rule, or a proposed removal of an existing ISO rule that is developed by the ISO pursuant to Section 41.42(3) of the <i>Electric Utilities Act</i>.</p>		
9	9.1	<p>Application</p> <p>This Part expires on the date the Commission issues a decision under Section 20.23 of the <i>Electric Utilities Act</i>.</p>	<p>Application</p> <p>This Part expires on the date the Commission issues a decision under Section 20.23 of the <i>Electric Utilities Act</i>.</p>		
10	10.1	<p>Notice for development of proposed provisional rules</p> <p>When the ISO develops or intends to develop a proposed provisional rule, the ISO must issue written notice to the Market Surveillance Administrator, market participants, and other interested parties prior to developing a proposed provisional rule and must post the notice on the ISO’s website.</p>	<p>Notice for development of proposed provisional rules</p> <p>When the ISO develops or intends to develop a proposed provisional rule, the ISO must issue written notice to the Market Surveillance Administrator, market participants, and other interested parties prior to developing a proposed provisional rule and must post the notice on the ISO’s website.</p>		

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10	10.2	<p>The notice must set out:</p> <ul style="list-style-type: none"> (a) the issue that a proposed provisional rule is intended to address; (b) a description of the potential objective or purpose of the proposed provisional rule; (c) the manner in which the Market Surveillance Administrator, market participants, and other interested parties may submit: <ul style="list-style-type: none"> (i) written comments; (ii) a notice of intent to participate in consultation; and (iii) comment on the form of consultation; (d) the deadline date for comments which must not be less than 15 days from the later of: <ul style="list-style-type: none"> (i) the date the notice is issued to the Market Surveillance Administrator, market participants, and other interested parties; or (ii) the date the notice is issued on the ISO's website; and (e) where the information outlined in subsection 10.3 can be accessed. 	<p>The notice must set out:</p> <ul style="list-style-type: none"> (a) the issue that a proposed provisional rule is intended to address; (b) a description of the potential objective or purpose of the proposed provisional rule; (c) the manner in which the Market Surveillance Administrator, market participants, and other interested parties may submit: <ul style="list-style-type: none"> (i) written comments; (ii) a notice of intent to participate in consultation; and (iii) comment on the form of consultation; (d) the deadline date for comments which must not be less than 15 days from the later of: <ul style="list-style-type: none"> (i) the date the notice is issued to the Market Surveillance Administrator, market participants, and other interested parties; or (ii) the date the notice is issued on the ISO's website; and (e) where the information outlined in subsection 10.3 can be accessed. 		
10	10.3	<p>When the notice is posted on the ISO's website, the ISO must also post a copy of any material the ISO considers to be relevant that is related to the need for, the development of, or removal of the proposed provisional rule.</p>	<p>When the notice is posted on the ISO's website, the ISO must also post a copy of any material the ISO considers to be relevant that is related to the need for, the development of, or removal of the proposed provisional rule.</p>		
11	11.1	<p>Comments</p> <p>The Market Surveillance Administrator, market participants, and interested parties may:</p> <ul style="list-style-type: none"> (a) provide general written comments to the ISO on the need for a proposed provisional rule; (b) submit a request to participate in consultation with the ISO; and (c) comment on the form of consultation. 	<p>Comments</p> <p>The Market Surveillance Administrator, market participants, and interested parties may:</p> <ul style="list-style-type: none"> (a) provide general written comments to the ISO on the need for a proposed provisional rule; (b) submit a request to participate in consultation with the ISO; and (c) comment on the form of consultation. 	<p>Amend 11.1(b) to - submit a notice of intent to participate in consultation with the ISO; and</p>	

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11	11.2	<p>Within 5 business days of receipt of comments, the ISO must:</p> <p>(a) post all submissions received pursuant to subsection 11.1 on the ISO's website; and</p> <p>(b) provide written notice to the Market Surveillance Administrator, market participants and other interested parties regarding where the information set out in subsection 11.2(a) can be accessed.</p>	<p>Within 5 business days of receipt of comments, the ISO must:</p> <p>(a) post all submissions received pursuant to subsection 11.1 on the ISO's website; and</p> <p>(b) provide written notice to the Market Surveillance Administrator, market participants and other interested parties regarding where the information set out in subsection 11.2(a) can be accessed.</p>		
12	12.1	<p>Consultation on proposed provisional rules</p> <p>Upon receipt of any notice of intent to participate in consultation, the ISO must:</p> <p>(a) form a consultation group or consultation groups composed of any parties:</p> <p>(i) who submitted a request to participate in consultation; or</p> <p>(ii) that the ISO thinks may be directly affected by the proposed provisional rule;</p> <p>(iii) consult with the consultation group(s) in a manner determined by the ISO to further develop the proposed provisional rule.</p>	<p>Consultation on proposed provisional rules</p> <p>Upon receipt of any notice of intent to participate in consultation, the ISO must:</p> <p>(a) form a consultation group or consultation groups composed of any parties:</p> <p>(i) who submitted a request to participate in consultation; and</p> <p>(ii) that the ISO thinks may be directly affected by the proposed provisional rule;</p> <p>(iii) consult with the consultation group(s) in a manner determined by the ISO to further develop the proposed provisional rule.</p>	<p>Replace or in 12.1(a)(i) with the word and</p>	
12	12.2	<p>When the ISO undertakes consultation with a consultation group or consultation groups under subsection 12.1, the ISO must provide an opportunity for members of the consultation group(s) to make submissions regarding the information required in subsections 13.2(b) through 13.2(j) of this rule.</p>	<p>When the ISO undertakes consultation with a consultation group or consultation groups under subsection 12.1, the ISO must provide an opportunity for members of the consultation group(s) to make submissions regarding the information required in subsections 13.2(b) through 13.2(j) of this rule.</p>		
12	12.3	<p>Following development of a proposed provisional rule, the ISO must provide written notice to the Market Surveillance Administrator, market participants and other interested parties and solicit comments on the proposed provisional rule by way of a:</p> <p>(a) proposed provisional rule comment matrix; and</p> <p>(b) request for comment on whether the proposed provisional rule is technically deficient.</p>	<p>Following development of a proposed provisional rule, the ISO must provide written notice to the Market Surveillance Administrator, market participants and other interested parties and solicit comments on the proposed provisional rule by way of a:</p> <p>(a) proposed provisional rule comment matrix; and</p> <p>(b) request for comment on whether the proposed provisional rule is technically deficient.</p>	<p>The stakeholder comment process would significantly benefit by requiring the AESO to reply to all comments received during consultation accompanied by an explanation as to why the positions/suggestions were accepted or rejected. This would reduce repetition of comments and questions, provide clarity on positions</p>	

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				and establish a complete record of options explored.	
12	12.4	The notice required by subsection 12.3 must: (a) be posted on the ISO's website; (b) include the information required by subsection 10.3, excluding the requirement in subsection 10.3(c)(ii) and 10.3(c)(iii); and (c) include the information required by subsection 10.4.	The notice required by subsection 12.3 must: (a) be posted on the ISO's website; (b) include the information required by subsection 10.3, excluding the requirement in subsection 10.3(c)(ii) and 10.3(c)(iii); and (c) include the information required by subsection 10.4.		
12	12.5	Within 5 business days of receipt of comments received pursuant to subsection 12.3, the ISO must: (a) post all submissions on the ISO's website; and (b) provide written notice to the Market Surveillance Administrator, market participants and other interested parties regarding where the submissions referred to in subsection 12.5(a) can be accessed.	Within 5 business days of receipt of comments received pursuant to subsection 12.3, the ISO must: (a) post all submissions on the ISO's website; and (b) provide written notice to the Market Surveillance Administrator, market participants and other interested parties regarding where the submissions referred to in subsection 12.5(a) can be accessed.		
12	12.6	After consulting with the working group(s), the ISO may proceed to make an application to the Commission under Section 13.	After consulting with the working group(s), the ISO may proceed to make an application to the Commission under Section 13.		
13	13.1	Application for Commission approval of proposed provisional rules and proposed initial rules The ISO must apply to the Commission for approval of a proposed provisional rule and a proposed initial rule.	Application for Commission approval of proposed provisional rules and proposed initial rules The ISO must apply to the Commission for approval of a proposed provisional rule and a proposed initial rule.		
13	13.2	An application for approval of a proposed provisional rule or a proposed initial rule must include the following information: (a) A description of the consultation process that was undertaken by the ISO including a list of parties who participated and copies of any submissions made by parties under subsections 12.2 and 12.3, if applicable; (b) An explanation of whether the proposed provisional rule or proposed initial rule relates to the capacity market and why; (c) If the proposed provisional rule or proposed initial rule relates to the capacity market, an explanation of whether or not the rule will be in effect for a fixed term and why;	An application for approval of a proposed provisional rule or a proposed initial rule must include the following information: (a) A description of the consultation process that was undertaken by the ISO including a list of parties who participated and copies of any submissions made by parties under subsections 12.2 and 12.3, if applicable; (b) An explanation of whether the proposed provisional rule or proposed initial rule relates to the capacity market and why; (c) If the proposed provisional rule or proposed initial rule relates to the capacity market, an explanation of whether or not the rule will be in effect for a fixed term and why;	The AUC needs to develop rules for CONE and Demand Curve, especially considering the re-occurring need for their approval. Inclusion in separate sections in Rule 017 may be appropriate. Section 13.2– Bill 13 differentiates between two markets, capacity and electricity, when accessing ISO Rules the AUC must keep in mind that the two markets are intertwined. A small change in one could have large	

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		(d) A description of the objective or purpose of the proposed provisional rule or proposed initial rule; (e) A copy of any analysis conducted or commissioned by the ISO supporting the proposed provisional rule or proposed initial rule, with a description of assumptions and methodology; (f) An explanation of why the proposed provisional rule or proposed initial rule, taken together with all ISO rules and in light of the principle of a fair, efficient and openly competitive market, was proposed; (g) A description of any alternatives that were explored during consultation and an explanation as to why they were rejected; (h) If the rule relates to the capacity market, a description of how the proposed provisional rule or proposed initial rule supports ensuring a reliable supply of electricity at a reasonable cost to customers; (i) An explanation of how the proposed provisional rule or proposed initial rule supports the public interest; and (j) For an application for approval of a proposed provisional rule, the ISO's targeted capacity procurement volumes for the first two capacity market auctions.	(d) A description of the objective or purpose of the proposed provisional rule or proposed initial rule; (e) A copy of any analysis conducted or commissioned by the ISO supporting the proposed provisional rule or proposed initial rule, with a description of assumptions and methodology; (f) An explanation of why the proposed provisional rule or proposed initial rule, taken together with all ISO rules and in light of the principle of a fair, efficient and openly competitive market, was proposed; (g) A description of any alternatives that were explored during consultation and an explanation as to why they were rejected; (h) If the rule relates to the capacity market, a description of how the proposed provisional rule or proposed initial rule supports ensuring a reliable supply of electricity at a reasonable cost to customers; (i) An explanation of how the proposed provisional rule or proposed initial rule supports the public interest; and (j) For an application for approval of a proposed provisional rule, the ISO's targeted capacity procurement volumes for the first two capacity market auctions.	<p>impacts in the other. Therefore the public interest may not be served by looking at the impacts in only one of the markets at a time. The same reasoning may apply to ensuring a reliable supply of electricity at a reasonable cost to customers. As such, the application for approval of a proposed provisional rule must explain how the proposed provisional rule applies to the entire market not simply the capacity market.</p>	
13	13.3	The Commission may establish additional application requirements for proposed provisional rules and proposed initial rules.	The Commission may establish additional application requirements for proposed provisional rules and proposed initial rules.		
14	14.1	Notice and consultation for proposed initial rules Following the Commission's order under Section 20.22(4) of the <i>Electric Utilities Act</i> (the "provisional decision"), for proposed initial rules that were not developed pursuant to Section 41.42(1) of the <i>Electric Utilities Act</i> , the ISO must provide notice and conduct any additional consultation, if any, in the manner directed by the Commission in the provisional decision within the timeframe directed by the Commission.	Notice and consultation for proposed initial rules Following the Commission's order under Section 20.22(4) of the <i>Electric Utilities Act</i> (the "provisional decision"), for proposed initial rules that were not developed pursuant to Section 41.42(1) of the <i>Electric Utilities Act</i> , the ISO must provide notice and conduct any additional consultation, if any, in the manner directed by the Commission in the provisional decision within the timeframe directed by the Commission.		
14	14.2	When the ISO identifies an issue, or receives a complete proposal under Section 20.81 of the <i>Electric Utilities Act</i> , that, in the opinion of the ISO, may require a proposed initial rule to	When the ISO identifies an issue, or receives a complete proposal under Section 20.81 of the <i>Electric Utilities Act</i> , that, in the opinion of the ISO, may require a proposed initial rule to		

Section	Subsection	Existing	Proposed changes	Stakeholder comment	AUC staff response
		be developed pursuant to Section 41.42(1) of the <i>Electric Utilities Act</i> , the ISO must provide notice and consult in the manner required by sections 10 through 12.	be developed pursuant to Section 41.42(1) of the <i>Electric Utilities Act</i> , the ISO must provide notice and consult in the manner required by sections 10 through 12.		
		Part 4: Application for Commission approval of expedited rules	Part 4: Application for Commission approval of expedited rules		
15	15.1	<p>Definitions</p> <p>In this Part:</p> <p>(a) “expedited ISO rule” means a proposed rule for which the Commission has approved expedited implementation under Section 20.6 of the <i>Electric Utilities Act</i>.</p> <p>(b) “proposed rule” has the meaning given to it in Part 2 of this rule.</p>	<p>Definitions</p> <p>In this Part:</p> <p>(a) “expedited ISO rule” means a proposed rule for which the Commission has approved expedited implementation under Section 20.6 of the <i>Electric Utilities Act</i>.</p> <p>(b) “proposed rule” has the meaning given to it in Part 2 of this rule.</p>		
16	16.1	<p>Application</p> <p>Subject to subsection 17.2, Part 2 of this rule does not apply to:</p> <p>(a) applications for expedited implementation of proposed rules; or</p> <p>(b) expedited rules.</p>	<p>Application</p> <p>Subject to subsection 17.2, Part 2 of this rule does not apply to:</p> <p>(a) applications for expedited implementation of proposed rules; or</p> <p>(b) expedited rules.</p>		
17	17.1	<p>Expedited rule applications</p> <p>The ISO must apply for Commission approval for expedited implementation of a proposed rule.</p>	<p>Expedited rule applications</p> <p>The ISO must apply for Commission approval for expedited implementation of a proposed rule.</p>		
17	17.2	<p>When the ISO makes an application to the Commission for expedited implementation of a proposed rule, it must provide written notice to the Market Surveillance Administrator, market participants and other interested parties in the manner set out in subsection 4.3(a) and (b) and includes the information required by subsection 4.4, if any.</p>	<p>When the ISO makes an application to the Commission for expedited implementation of a proposed rule, it must provide written notice to the Market Surveillance Administrator, market participants and other interested parties in the manner set out in subsection 4.3(a) and (b) and includes the information required by subsection 4.4, if any.</p>		
17	17.3	<p>An application for Commission approval for expedited implementation of a proposed rule must include:</p> <p>(a) a copy of the proposed rule for which expedited implementation is sought; and</p> <p>(b) a description of:</p>	<p>An application for Commission approval for expedited implementation of a proposed rule must include:</p> <p>(a) a copy of the proposed rule for which expedited implementation is sought; and</p> <p>(b) a description of:</p>		

Section	Subsection	Existing	Proposed changes	Stakeholder comment	AUC staff response
		(i) the urgent risk to the reliable supply of electricity, if any; (ii) the urgent risk to the safe and reliable operation of the interconnected electric system, if any; or (iii) the reason for requesting expedited implementation of the proposed rule if it does not fall within (i) or (ii).	(i) the urgent risk to the reliable supply of electricity, if any; (ii) the urgent risk to the safe and reliable operation of the interconnected electric system, if any; or (iii) the reason for requesting expedited implementation of the proposed rule if it does not fall within (i) or (ii).		
17	17.4	If the Commission approves expedited implementation of a proposed rule, the ISO must post the expedited ISO rule on the ISO's website on the day upon which the expedited implementation is approved by the Commission.	If the Commission approves expedited implementation of a proposed rule, the ISO must post the expedited ISO rule on the ISO's website on the day upon which the expedited implementation is approved by the Commission.		

General category	General stakeholder comments	AUC staff response	Section of Rule 017
Demand Curve Governance	<p>The UCA continues to support the need for specific accommodation to address the demand curve. Certain demand curve parameters need to be addressed on a yearly basis. This could be accomplished in Rule 017 or another rule. Certainty is needed to understand when parameters will be updated.</p>		
Other Rules	<p>Other AUC rules may be impacted by capacity market rules. A process for reviewing the impacts should be considered.</p>		