

Stakeholder Comment Form

Rule 6.6 Review – Recommendation Update

Date of Request for Comment: February 2, 2009
Period of Consultation: January 15, 2009 to February 2, 2009

Stakeholder: EPCOR

Recommendation	Stakeholder Comments
1 The AESO recommends that steady state dispatch compliance is based on the unit integrated average MW output for each clock 10 minute period	<p>We are pleased that the AESO is planning to continue with a tolerance level of “the greater of ± 5 MW or 2.5% of the assets Maximum Capability up to a maximum of 10 MW for a generator that has reached its dispatch level”.</p> <p>EPCOR would support the use of a 10 min. rolling window in which an average net MW production value is compared to dispatch. However, 10 minute segments of time, as proposed by the AESO in the presentation on January 29, does not provide warning of a potential non-compliance event. A real-time operator looking at a 10 minute rolling time frame would be able to identify if the unit is meeting the required dispatch level and take appropriate steps in real time to bring the unit into compliance or inform the AESO of potential operational issues; the 10 minute segments proposed by the AESO would not allow this real time response.</p>
2 The AESO recommends that the maximum delay time to start ramping be increased to 10 minutes and	<p>The +/- 40% tolerance for ramping is reasonable for dispatches above MSG, if this were combined with the proposed 10 minute delay time to start ramping.</p>
3. Participants submit a ramp profile for each of their generating assets.	<p>EPCOR would not support the use of ramp profiles, as multiple ramp profiles would be required to accurately inform the AESO of the unit’s capabilities. Participants would likely need to submit ramp profiles that differ for different operating conditions, such as cold starts, warm starts or hot starts.</p>

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	<p>EPCOR agrees with the proposal that the rule recognize operational challenges between 0 MW and MSG. However, EPCOR is concerned that the rule, as proposed, may not properly address operational challenges that arise when MSG at a particular unit is required to be increased above the amount that has been entered into the AESO’s ETS system. MSG is currently a single fixed value entered into the AESO’s ETS system. EPCOR believes that the responsible market participant should have the ability to restate the MSG (rather than offers) in appropriate circumstances. This would enable the system controller to properly understand the operating characteristics of the affected unit and allow the market participant to avoid being non-compliant with the AESO rule.</p>
<p>4. The rule will contain language that prohibits intentional deviation from the dispatch level. Checks for intentional non-compliance include deviation and price correlation, synchronization to the grid, intentionally operating at a different level than the dispatch level</p>	<p>EPCOR supports a rule which prohibits intentional deviation from the dispatch level. We believe that a rule that dealt with only this element of non-compliance would be sufficient and that the AESO would not need any additional elements to the rule if only intentional non-compliance were addressed.</p>
<p>5. Next steps</p> <p>Other Meter Sources of Data used for Compliance Monitoring.</p>	<p>EPCOR is very concerned about the multiplicity of sources of information from which compliance information is drawn. If the AESO continues to be of the view that the “pool participant” is the appropriate party for compliance purposes, a single, transparent data source is an essential component of the compliance framework. This data source should be available to and used by all parties (including the operator, the pool participant (if different than the operator) and the AESO) for compliance monitoring purposes.</p> <p>The AESO’s Current Supply and Demand page is the closest information to a common data source of which EPCOR is aware. This report is currently subject to the following disclaimer: <u>“Report Disclaimer</u> <i>The above information is presented as a reasonable estimate of the Alberta supply & demand status at the time indicated above. With the exception of MCR, all information presented is based on SCADA</i></p>

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	<p data-bbox="655 280 1864 310"><i>data as received by the AESO. Certain events such as SCADA errors may result in erroneous values.”</i></p> <p data-bbox="655 342 1864 557">Parties should be able to rely on the chosen data source when subjected to compliance inquiries and sanctions. There have been occasions when incorrect information (eg. unit trips) has been displayed on this page. We have inquired with the AESO about the accuracy of the information and its effect on the trading market and have referred to this disclaimer. The errors and disclaimer makes it unlikely that a party could rely on this report in compliance proceedings.</p>