

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: ___BowArk Energy Ltd._____

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	
2 The AESO recommends that the maximum delay time to start ramping be increased to 10 minutes and	
3. Participants submit a ramp profile for each of their generating assets.	
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	BowArk Energy does not have a 24 hour trading desk and our 6 MW generating facility is staffed only during on-peak hours. As such, we require the +/- 5MW margin to stay within compliance of our standing bid. Requiring our very small operation to comply with bid without sufficient margin on a 24 hour by 7 day basis would cause considerable financial hardship. Our revenues from such a small operation can not support the overhead costs such rule changes require and would force small generators like ourselves out of the market. The current flexibility afforded by +/- 5 MW margin must not be restricted for small generators in any way. BowArk believes for units <10MW be exempt or grandfathered from any rule

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	changes which would judge the generator non-compliant for not responding to dispatch signal.
5. Next steps	