

Stakeholder Comment Form

Rule 6.6 Review – Recommendation Update

Date of Request for Comment: February 6, 2009
Period of Consultation: January 15, 2009 to February 6, 2009

Stakeholder: ___Northstone Power Corp._____

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	Northstone Power agrees with the comment submitted by Bowark on Jan 19, 2009 but would prefer the grandfathering for small generators be for units <15MW to ensure we can keep our focus on reliable operations. Be believe the unintended consequence of the rule change will result in increased administration and associated costs to small producers. We often discover these rule changes occur to address certain generators who engage in gaming and questionable procedures...the small generator should not have to pay the price for rule changes that are intended to stop specific actions of specific generators, especially during an economic crisis.

Recommendation	Stakeholder Comments
	<p>As a note, it was very difficult for us or any small generator to determine that Rule 6.6 pertained to our operations. The AESO may have followed normal review procedures but small generators will not always have sufficient staffing to catch these items. As far as we can determine not one small generator picked up on this rule change. We believe that flags should have been raised within the AESO when no small producers responded to or participated in the consultation process, especially when the AESO is aware the rule change being proposed has a impact to small generators. As a result we feel blindsided by the rule change and upset we were not able to comment on the recommendation paper issued in October 2008. In addition, because we missed the early review process we cannot be entirely sure we fully understand the complete impact the rule change will have on our organization.</p>
5. Next steps	