



Stakeholder Comment Form

AESO AUTHORITATIVE DOCUMENT PROCESS

**New G1 Definitions
New ISO Rule 5**

NOTE: The AESO is asking market participants to give an initial indication of their support for, or opposition to, the specific ISO rule changes referenced below. Such an initial indication assists in the AESO's practical understanding of the receptivity of the industry to the proposed changes, and in that regard the AESO thanks in advance all market participants who choose to respond. With regard to the specific ISO rule changes and their implications, such responses are without prejudice to the rights of market participants under the Act, any regulations, or related decisions of the Commission.

Date of Request for Comment: December 17, 2009
 Period of Consultation: December 17, 2009 through January 29, 2010

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G1 Definitions to ISO Rules	
<p>“scheduled generator outage” means the period of time as planned by the owner of a generating unit during which that generating unit is partially or fully removed, derated from, or otherwise is not physically or mechanically available for service by the owner due to planned or scheduled maintenance or repairs to any of the plant, equipment or components of the generating unit.</p> <p>“incremental generation costs” means, where the ISO has issued a directive under ISO rule 6.3.5 or 5.3 requiring that the generating unit be made available to, or to actually operate, exchange electric energy or provide ancillary services, those reasonable costs incurred that are</p>	<p align="center">Support Oppose No Comment</p> <p>B(iv) TransAlta suggests the following changes:</p> <p>(B) any third party market or hedging transaction <u>costs</u> directly related to participation in the energy or <u>Ancillary Services</u> market by the generating unit which is subject to the directive.</p>

reasonably attributed to compliance with the **directive** and which may reasonably be determined to have been avoided but for the **directive**, and include:

- (a) the following specific costs as incurred and related to compliance with a **directive** for long lead time energy under **ISO rule 6.3.5**:
 - (i) the actual costs of all variable charges from the **STS Rate Schedule** of the **ISO Tariff**, including any applicable **loss factors** charge or credit;
 - (ii) variable operational and maintenance charges;
 - (iii) fuel costs to start and run the **generating unit** ; and,
 - (iv) other related reasonable costs.
- (b) the following specific costs as incurred and related to compliance with a **directive** canceling a **scheduled generator outage** for a **generation unit** under **ISO rule 5.3**:
 - (i) those incurred to plan, prepare for and execute the **scheduled generator outage**, from initial planning and inception to the date of the **directive** from the **ISO** canceling the **scheduled generator outage**;
 - (ii) those incurred subsequent to the date of cancellation by the **directive** and in accordance with **good electric operating practice**, and otherwise which would not have been incurred but for the cancellation;
 - (iii) those incurred for re-scheduling personnel, equipment and other materials required for the performance of the work originally to be completed or performed pursuant to the cancelled **scheduled generator outage**;

<p>(iv) in the form of verified damages or liquidated claims dollar amounts incurred or claimed by third parties pursuant or related to:</p> <p>(A) any third party contract terms and conditions for performing repair, retrofit, upgrade or maintenance work on or directly related to the generating unit during the scheduled generator outage, which third party work has been cancelled or otherwise cannot be performed due to the scheduled generator outage cancellation;</p> <p>(B) any third party market or hedging transactions directly related to participation in the energy market by the generating unit which is the subject of the directive; and</p> <p>(v) other related reasonable costs.</p>	
Reason for Stakeholder Positions:	
Alternate Proposal:	
ISO rule 5 Reliability Assessment and Scheduled Outage Cancellation	
1. Applicability	
<p>(1) To the ISO.</p> <p>(2) To a pool participant registered under Section 1 of the ISO rules to exchange or transact with respect to a specific generating unit.</p> <p>(3) To an owner of a generating unit.</p>	<p>Support Oppose No Comment</p>

(4) To market participants.	
Reason for Stakeholder Positions:	
Alternate Proposal:	
2. Requirements	
5.1 Reliability and Adequacy Assessments <ul style="list-style-type: none"> (1) The ISO will, on an as required basis, apply all Alberta reliability standards and operating polices and procedures criteria for the purpose of assessing reliability. (2) For the purpose of assessing adequacy the ISO will: <ul style="list-style-type: none"> (a) complete a supply and demand forecast using the peak demand hour for every day for the next successive two (2) year period, incorporating or addressing the following: <ul style="list-style-type: none"> (i) the sum of the maximum capability from all generating units in Alberta with a maximum capability equal to or greater than 5 MW, plus (ii) an estimate of the output from wind generating units , plus (iii) import available transfer capability on the British Columbia and Saskatchewan interconnections with ILRAS, minus (iv) declared generating unit deratings, minus (v) any capacity of generating units which are affected by transmission constraints, minus (vi) anticipated generating unit derates, minus 	Support Oppose No Comment

- (vii) the daily forecast Alberta internal **load** demand, minus
- (viii) **operating reserves** requirements, plus
- (ix) price responsive **load**, plus
- (x) aggregate **outage** records for **load**, plus
- (xi) **load** for **demand opportunity service**.

(b) complete a real time **adequacy** assessment for each **settlement interval** for the **trading day** and for the six (6) remaining **days** of the **forecast scheduling period** on the **day** preceding that **trading day**, and which assessment will incorporate or address the following:

- (i) the sum of the **available capability** of all **generating units** in Alberta with a **maximum capability** equal to or greater than five (5) **MW**, and with a start up time either:
 - (A) less than or equal to one (1) hour, or
 - (B) at or before the period being assessed, plus
- (ii) an estimate of the output from all wind **generating units**, plus
- (iii) an estimate of the amount of price responsive **load** that will reduce **demand**; plus
- (iv) an estimate of **load** for **demand opportunity service** that will be curtailed; plus
- (v) an estimate of the amount of on site generation that supplies behind the fence **load** and submits

<p>available capacity as net-to grid value; minus</p> <ul style="list-style-type: none"> (vi) an estimate of the amount of anticipated generating unit derates, plus (vii) import to forecast available transfer capability on the British Columbia and Saskatchewan interconnections, plus (viii) reducing exports on the Alberta –British Columbia and Alberta- Saskatchewan interconnections to zero (0) MW, plus (ix) all supplemental reserves and excess spinning reserves delivered, plus (x) generating unit or import available transfer capacity that can be obtained by canceling transmission system maintenance, minus (xi) unavailable energy from generating units due to transmission constraints. 	
<p>Reason for Stakeholder Positions:</p>	
<p>Alternate Proposal:</p>	
<p>5.2 Generating Unit Scheduled Generator Outage Reporting</p> <p>For any generating unit with</p> <ul style="list-style-type: none"> (a) installed capacities of five (5) MW or higher; or (b) derate changes of plus or minus five (5) MW or greater; <p>the owner of the generating unit, or the subsection 1(2) pool participant if different from the owner, must comply with the scheduled generator outage reporting requirements for the</p>	<p style="text-align: center;">Support Oppose No Comment</p> <p>If the definition of generating asset is replaced with generation unit in the proposed rules, it creates many difficulties for hydro, wind and potentially some cogen sites. Given this we would ask the AESO to consider an exemption or other definition for assets that have</p>

generating unit as set forth in the **ISO rules** below.

5.2.1 Timely Information From Owner to Pool Participant

- (1) The **owner** of a **generating unit** must provide to a subsection 1(2) **pool participant**, such timely and complete information so as to enable the **pool participant** to comply with its obligations set out under this section 5.2.

5.2.2 Specific Scheduled Generator Outage and Forced Outage Reporting Requirements

- (1) Subject to subsection (2), each subsection 1(2) **pool participant** must use the outage scheduling entry in the **Energy Trading System** to provide to the **ISO** the dates, times, durations, and impact to **MW** capability for any **scheduled generator outage** and the specific nature of the **scheduled generator outage** work to be done as well as designate the outage as “Derate-Planned” or “Outage-Planned”.
- (2) The subsection 1(2) **pool participant** must comply with the following specific requirements when submitting either **forced outage** or **scheduled generator outage** information to the **ISO**:
 - (a) by the first (1st) day of every month subsequent to the date of **commissioning**, submit **scheduled generator outages** that are known or planned to occur at any time within the next twenty four (24) months after that day, with any subsequent revisions to the plans submitted to the **ISO** as soon as reasonably practical after the decision is made by the **owner** of the **generating unit** to change the plans, but in any event

more than one generating unit behind one point of interconnection that have integrated systems.

Specifically the integrated systems do not necessarily result in estimated AC values that will always match based on a “unit” explanation rather they are on a system explanation. Further the ETS system allows for a short comment box to describe the “specific nature” of the outage. When one or more unit is involved the space in ETS may not be sufficient or efficient for managing this information. Can the AESO clarify what is required in terms of detail for specific nature of the outage? Also is there another method to collect the by unit information. TransAlta would suggest an excel upload is created that is not entered into ETS.

In the specific case of Hydro.

As our first priority of water management is safety this is obtained by minimizing any rapid or sudden changes flows on our river systems with the highest priority is to achieve a steady state of flow through the City of Calgary this completed by means of "water movement" and "timing" . From the Kananskis river system (interlakes , Barrier and Pocaterra generating stations) and the upstream Bow river generating stations of Three sisters ,Rundle ,Spray ,Cascade to the run of river plants of Kananaski and Horseshoe generating stations is dependant on timing of flow as there is no storage capacity at these "run of river facilities " , **hence the Available Capacity (AC) for each hour would reflect the timing of water and the amount of flow in cubic feet per second(cfs) reflected as a megawatt to through these run of river facilities** onto the Ghost facility and lastly

<p>no later than three (3) months prior to the first day the scheduled generator outage is planned to commence;</p> <p>(b) for scheduled generator outages that are known or planned to be required within the next three (3) months after the first (1st) day of a month, submit the plan as soon as reasonably practical if different than the plan referred to in Subsection (2) (a) above, but in any event no later than three (3) days of the decision being made by the owner of the generating unit, which submission must include a statement setting out the reasons that the new plan for the scheduled generator outage was not included in, or must vary from, the original Subsection (2) (a) submission;</p> <p>(c) for a forced outage:</p> <p>(i) inform the system controller on a telephone line designated by the ISO which will contain a voice recording system; and</p> <p>(ii) use the outage scheduling entry in the Energy Trading System to provide to the ISO the dates, times, durations, and impact to MW capability for the forced outage and designate the outage as “Derate-Forced” or “Outage-Forced”.</p> <p>(3) The subsection 1 (2) pool participant must provide to the ISO in writing a list of contact persons who will be involved in the planning of scheduled generator outages, and be in a position of authority to resolve with the ISO any issues or concerns regarding scheduled generator outages and forced outages.</p>	<p>through Bears Paw Generating station to maintaining a steady flow state through the city of Calgary .</p> <p>The proposed change to OPP 606 outage scheduling to generating “unit” from “asset” for the BOW 1 asset creates several difficulties :</p> <ol style="list-style-type: none"> 1. The accuracy at what mega watt produced by each unit at a specific hour based on water movement and inflows(cfs) in very hard to predict in degrees of unit de-rate timing per unit hence the Kananski unit 3 maybe de-rated until water is received from the Kananskis river system from 14:00(he)to 10:00 (HE) when Kananski water is received it will run at 10MW for 2 hours then be de-rated for several more hours until Spray system water reaches the Kananskis units .This will be subjective to several uncontrollable forces such as ice issues and inflows based on specific weather patterns. . 2. If the intent is the Outage schedule in ETS will be utilized only for the intent of ISO reliability under rule OPP 606 there would be a need to have additional resource in supporting inputting of the data and specific outage details approximately 300 Hours/year. We would question the need for this information at this level. Can the AESO consider an upload format rather than an input into ETS for this? 3. If the intent is to also have the BOW 1 asset dispatched through the Adams system by “unit” an additional 4 Full time Hydro system Control Center Operators and an Hydro scheduler would be required to manage the volume of dispatches and directives through the AESO Adams systems and maintain compliance
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<p>5.2.3 Generating Unit Outage Information Confidentiality</p> <p>Subject to Section 5.2.4 below, scheduled generator outage and related information submitted to the ISO under these ISO rules will be kept confidential by the ISO in accordance with ISO rules and the related ISO policies and procedures, except as otherwise required to be made public under any legislation, regulation or any other provision of the ISO rules, or to WECC under any applicable agreement provisions.</p> <p>5.2.4 Aggregate Information Posting</p> <p>The ISO will post on its website and on an aggregate basis the scheduled generator outage information for all generating units, in a manner that seeks to preserve the confidential nature of the subject matter and precludes the identification of any owners, the subsection 1(2) pool participant or other directly affected pool participants.</p>	<p>4. The sheer volume of data to be processed by the AESO Adams system is of concern in regards to the reliability and speed it has been noted for several months the system is very slow to update once you have accepted a dispatched.</p> <p>5.2.2.(1) TransAlta is unclear the system accept specific nature details.. Can we upload a document? Is there a limited text box for this information? This is complicated information and subject to change. An upload file where large text files can be attached would be needed to get rid of large unnecessary administrative burden to the participants, particularly hydro assets on the same river system.</p> <p>5.2.2(2)c; TransAlta questions the need for a participant to undertake both a) and b) under this section. When a forced outage has occurred system operations is very busy and should be focusing on the unit rather taking two actions to inform the system operator when one should suffice.</p>
<p>Reason for Stakeholder Positions:</p>	
<p>Alternate Proposal:</p>	
<p>5.3. Authority to Issue a Scheduled Generator Outage Cancellation Directive</p> <p>(1) Pursuant to subsection 18(1) of the T-Reg the ISO may issue a directive to an owner of a generating unit, or the subsection 1(2) pool participant or both if different persons, to cancel a scheduled generator outage planned for that</p>	<p>Support Oppose No Comment</p> <p>5.3.1 (7) b...TransAlta requests that AESO clarify what is mean by functional impact versus operational impact. The difference is currently unclear to us..</p>

generating unit based on the **reliability** and **adequacy assessments** conducted under the provisions of Section 5.1 and under the specific circumstances and in accordance with the procedures set out in these **ISO rules**.

- (2) No **directive** canceling a **scheduled generator outage** will be issued by the **ISO** without the authorization of the Chief Executive Officer of the **ISO** or his designee.

5.3.1 Scheduled Generator Outage Cancellation Procedure

Prior to issuing a **directive** canceling a **scheduled generator outage**, the **ISO** must comply with the following procedures, in the following sequence:

- (1) The **ISO** will consider and analyze the results of the assessments undertaken in accordance with Section 5.1 above, and perform a further assessment of the status of all **generating units** in Alberta based on all **scheduled generator outage** plans submitted by all subsection 1(2) **pool participants** under Section 5.2.2 above.
- (2) After completing the assessments, and taking in to account the total amount of all **generating unit** capacity in Alberta which is planned for **scheduled generator outages**, if the **ISO** determines that there is a high probability of an **adequacy** or **reliability** shortfall then the **ISO** will notify **market participants** on the **AESO** website of its determination.
- (3) The **ISO** will continue to conduct further situational analysis to seek to alleviate the potential **adequacy** or **reliability** shortfall and avoid the cancellation of any **scheduled**

generator outages.

- (4) The **ISO** will post the determination referred to in subsection (2) above for a minimum period of one (1) calendar week, and in anticipation that certain **owners** of **generating units** may have flexibility to voluntarily amend plans for **scheduled generator outages** to assist in the alleviation of the **adequacy** or **reliability** shortfall situation.

- (5) If the **ISO** notification and any resulting voluntary actions referred to in subsection (4) above do not result in a reduction in the total amount of **generating unit** capacity planned for **scheduled generator outages** such that the forecast **adequacy** or **reliability** shortfall will be alleviated, then the **ISO** will contact the individual **owners** to request that **scheduled generator outage** plans be further reviewed.

- (6) If after completing the assessments and procedures set out in subsections (1) through (5) above the **ISO** determines that there remains:
 - (a) an immediate need on a short term basis for services provided by certain **generating units** to maintain the necessary level of **reliability** or **adequacy**, as the case may be; and

 - (b) a high probability that the situation will not be alleviated in a voluntary manner:
 - (i) by any **owners** of **generating units** amending or revising **scheduled generator outage** plans; or

(ii) through the ordinary course operation of the market;

then the **ISO**, after also taking in to account the factors set out in subsection (7) below, may issue a **directive** to cancel a **scheduled generator outage** planned for that **generating unit**, which cancellation must be on a date no sooner than ninety (90) **days** in advance of the first **day** of the period which has be determined to be the commencement of the **reliability** or **adequacy** shortfall.

(7) The **ISO** must consider all of the following factors in its determination as to whether or not to issue a **directive** canceling a **scheduled generator outage** as contemplated in this Section 5.3.1:

- (a) The economic and operational consequences for the **owner** of the **generating unit** and for any subsection 1(2) **pool participant**, if a different **person**;
- (b) The operational and functional impact on the **generating unit** if the subject **scheduled generator outage** is cancelled;
- (c) The effectiveness of canceling the subject **scheduled generator outage** in alleviating the **reliability** or **adequacy** shortfall;
- (d) The historical frequency that a given **generating unit** has been the subject of **scheduled generator outage** cancellations, relative to other **generating units** in Alberta;

- (e) The length of time of, and reasons for, any **scheduled generator outage** as previously submitted to the **ISO** by the subsection 1(2) **pool participant** under the reporting requirements set out in these **ISO rules**;
- (f) The extent to which the **scheduled generator outage** will begin or end during the period of the forecast **reliability** or **adequacy** shortfall;
- (g) Any requirements or material implications under or related to any applicable municipal, provincial or federal legislation or regulations, if the **ISO** proceeds to issue a **directive** to cancel a given **scheduled generator outage**;
- (h) The practicality and effectiveness of market-based solutions to alleviate the **reliability** or **adequacy** shortfall, including a consideration of **load** curtailment options.

5.3.2 Scheduled Generator Outage Planned Costs and Work Submission

- (1) The **owner** of a **generating unit** who has received notice of the cancellation of a **scheduled generator outage** for the **generating unit** must use all reasonable efforts to submit to the **ISO** in advance of the period when the outage would have occurred:
 - (a) a detailed description and estimation of the work, costs and expenses which are to be carried out during the **scheduled generator outage**, including an itemization of the specific plant, machinery and

equipment which are the subject of the work during the that period; and

- (b) an estimate of any known or anticipated **incremental generation costs** that may be the basis for a claim for compensation under these **ISO rules**.

- (2) The submissions set out in subsection (1) do not limit compensation claims for other reasonable demonstrable costs

5.3.3 Time Constrained Scheduled Generator Outage Cancellation

Notwithstanding the provisions of Section 5.3.1, if in the opinion of the **ISO** it is evident that immediate **reliability** or **adequacy** circumstances will not allow sufficient time to permit the **ISO** to comply with any or all of the procedures set out in that Section 5.3.1, then the **ISO** may dispense with any such procedures and proceed to issue a **directive** to cancel a **scheduled generator outage**.

5.3.4 Scheduled Generator Outage Cancellation Report

If the **ISO** issues a **directive** under this Section 5.3 to cancel a **scheduled generator outage** then the **ISO** must prepare a report and post it on the **ISO** website, which report will contain:

- (a) an explanation of the circumstances, background and chronological events that caused and are related to the issuance of the **directive** cancelling the **scheduled generator outage**;
- (b) the particulars of the **scheduled generator outage** that was cancelled, including date of cancellation, duration, and

<p>quantities (MW) affected;</p> <p>(c) any material market impacts known to the ISO;</p> <p>(d) whether the cancellation was a time and procedurally constrained one under Section 5.3.3, and the reasons for a decision to depart from any prescribed procedures set out in Section 5.3.1; and</p> <p>(e) any other matters that, in the ISO's opinion, will provide a full and complete explanation to all market participants of the decision taken.</p>	
<p>Reason for Stakeholder Positions:</p>	
<p>Alternate Proposal:</p>	
<p>5.4 Payment Eligibility for Incremental Generation Costs, and Claim Limitations</p> <p>(1) The subsection 1(2) pool participant or the owner of the generating unit, or both of them if different persons, that has had a scheduled generator outage cancelled by a directive under these ISO rules is eligible as a claimant for an incremental generation costs payment in accordance with the provisions and procedures of this Section 5.4.</p> <p>(2) Subject to subsection (7) below, the ISO must pay any incremental generation costs payment to the section 1(2) pool participant or the owner of the generating unit, or both if different persons, whose scheduled generator outage has been canceled by a directive from the ISO pursuant to Section 5.3.</p>	<p>Support Oppose No Comment</p> <p>TransAlta is concerned that the AESO is unnecessarily and unfairly cutting off compensation to those directed by limiting the window for claims to 90 days when this will not always be reasonable for those submitting. A true up mechanism for receipts that cannot be submitted within this window must be created to ensure the opportunity for fair compensation. Examples of costs that may not be clear within the 3 month window include: third party disputes with contractor that are unsettled by the 3 month period. Increase in costs of contractors etc related to the outage, where the outage is rescheduled and taken are higher due to seasonal</p>

<p>(3) Within ninety (90) days after the end of the settlement period related to the period during which the directive was effective , the claimant under this Section 5.4 must provide the ISO with a written statement which contains the details of the claim and calculation of incremental generation costs as incurred caused by the cancellation.</p> <p>(4) The claimant must provide to the ISO any and all of the claimant's own and third party supporting data, records, invoices, formulas, calculations, third party contract claims and related terms and conditions, and any other information or materials used to calculate or determine the amounts claimed in the statement, plus any other detail and information as may be reasonably requested by the ISO in order to verify the subject incremental generation costs, claims, calculations and particulars.</p> <p>(5) Once the submission and related materials are filed with the ISO and any information deficiencies have been met by the claimant, the ISO approval of the compensation and settlement in respect of any incremental generation costs will occur on or before the fortieth (40th) day following the day of the receipt by the ISO of the last of any initial submission or deficiency materials.</p> <p>(6) If there is any dispute between a claimant and the ISO, in respect of an incremental generation cost claim for compensation then the matter will be resolved in accordance with the provisions of applicable ISO rules.</p> <p>(7) If the claimant has been issued a directive to cancel a scheduled generator outage but is eligible for compensation for such cancellation pursuant to the provisions of a transmission must run contract with the</p>	<p>factors etc. Further the outage scheduled to replace the cancelled one may not occur until after the 90 day window for receipts is closed. In this circumstance we may have increased contractor costs that we must incur but for the cancellation of the first outage. These costs will not be known until the outage is taken. Thus a True Up mechanism for these costs must be created. Even if this is challenging it is required to ensure fair and reasonable compensation. One suggestion would be to use a mechanism like the current deferral account reconciliation mechanism.</p>
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<p>ISO, then the claimant will not be eligible for incremental generation cost claims under this Section 5.4.</p> <p>(8) No incremental generation cost claim by any claimant may include:</p> <ul style="list-style-type: none"> (a) any costs or claims associated with or related to the claimant's market or hedging portfolio, other than those allowed under subsection (iv) (B) of the definition of incremental generation costs which limits such costs and claims to the generating unit which is the subject of the directive; (b) any form of lost opportunity costs, or other form of loss of profits, revenue, earnings or revenue not specifically provided for in the definition of incremental generation costs; (c) any raw material, fuel, processing, production, manufacturing or industrial costs of any nature which are not directly related to the generating unit's participation in the energy market; (d) any fixed costs (e) any costs or claims that otherwise could have been mitigated by the claimant through all reasonable efforts. 	
Reason for Stakeholder Positions:	
Alternate Proposal:	
5.5 Forecast Dispatch Price	

<p>The ISO will use reasonable efforts to publish a forecast dispatch price for each settlement interval no later than seventy (70) minutes prior to the start of such settlement interval.</p> <p>5.5.1 Determination of Forecast Dispatch Price</p> <p>The forecast dispatch price for a settlement interval is the highest forecast asset marginal price of all assets forecast to be required to meet the forecast load requirement, using the expected energy market merit order for the settlement interval including importer operating blocks and the ISO expected import ATC for the interconnections for the settlement interval.</p> <p>5.5.2 Determination of Forecast Asset Marginal Price</p> <p>The forecast asset marginal price for a pool participant's asset for each settlement interval will be set at the price specified for the price block in the pool participant's offer or bid which corresponds to the forecast energy market dispatch level of the asset to meet the forecast load requirement.</p>	<p>Support Oppose No Comment</p>
<p><i>Reason for Stakeholder Positions:</i></p>	
<p><i>Alternate Proposal:</i></p>	
<p>Section 8.1.1 Settlement at Pool Price</p> <p><i>The following section is added to the end of Section 8.1.1 "Settlement at Pool Price":</i></p>	<p>Support Oppose No Comment</p>



The calculation of payment for **incremental generation costs** incurred due to the cancellation of a **scheduled generator outage** of a **generating asset** will be based on the information provided to the **ISO** by the claimant in accordance with the provisions of Section 5.4.

Section 8.4.2 Final Pool Statement

The following Subsection l) is added to the end of Section 8.4.2 “Final Pool Statement”

l) Incremental Generation Costs Due to Scheduled Generator Outage Cancellation

The **ISO** may charge to all **pool participants** an **ISO fee** to recover the **incremental generation costs** paid under an approved claim by a **pool participant** who has been issued a **directive** to cancel a **scheduled generator outage** under Section 5. The contribution paid by a **pool participant** is determined by prorating the amount paid to settle the **incremental generation costs** claim over the total **energy consumption** of each **pool participant** during the **settlement intervals** in which the **incremental generation costs** were incurred. Such costs will be invoiced and discretely identified in the **pool statement**.

Reason for Stakeholder Positions:

Alternate Proposal:

Please return this form with your comments by Friday, January 29, 2010, to:

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