

## Stakeholder Comment Form

### Rule 6.6 Review – Recommendation Paper

Date of Request for Comment: November 18, 2008  
Period of Consultation: October 30, 2008- November 18, 2008

Stakeholder: \_\_Alberta Direct Connect Consumers Association (“ADC”)\_\_\_\_\_

Section of Paper	Description	Stakeholder Comments
<b>1. Introduction</b>		
<b>2.1 Rule History</b>	A brief history of rule 6.6	
<b>2.2. The Compliance Monitoring Process</b>	An overview of the current compliance monitoring process	
<b>2.3 Rationale for Changing the Rule</b>	The drivers and parameters behind the rule change	
<b>2.4 Issue Identification</b>	A summary of the issues that participants have raised as well as some identified by the AESO	
<b>3 Rule Revision Recommendations</b>	Considerations for developing the rule	
<b>3.1 Pool participants are responsible for compliance with the ISO Rules.</b>	The AESO recommends the Pool Participant remains accountable for compliance	
<b>3.2 The +5MW allowable</b>	Recommendation is to	

Section of Paper	Description	Stakeholder Comments
<b>dispatch variance should be increased for units operating at their dispatch level.</b>	change the allowable dispatch variance to 2.5%, minimum of $\pm 5$ MW, maximum of $\pm 10$ MW	
<b>3.3 The Rule must take into account time required for communication and ramping of a unit in response to a dispatch.</b>	Recommendation is to allow 7 minutes to begin responding and the time to ramp at the ETS ramp rate $+40\%$	
<b>3.4 The rule should allow for normal fluctuations in output from generating units.</b>	The new rule should consider momentary operational deviations from the dispatch level.	
<b>3.5 Preparation to provide Operating Reserves must be considered</b>	The 15 minutes allowed for positioning to provide AS will be considered in the rule.	
<b>3.6 There must be allowance for governor action during frequency excursions.</b>	Governor action in response to a frequency deviation will be considered in the rule.	
<b>3.7 The Rule must recognize the operational challenges when ramping between 0 MW and minimum stable output.</b>	The rule will describe specific steps for operating below minimum stable generation level.	
<b>3.8 Participants must comply with small offer block volumes</b>	More stringent rules for small offer blocks and small units.	
<b>4. Policy Adherence</b>		
<b>5. Implementation</b>		

Section of Paper	Description	Stakeholder Comments
<b>Considerations</b>		
<b>6. Summary of Recommendations</b>		The ADC supports the recommendations of the AESO on this rule. It is important to keep the tolerances as tight as possible while recognizing the reasonable technical limitations of the generation fleet. Any non-compliance event in times of high prices (i.e. greater than \$150) should be forwarded to the MSA for investigation.
<b>7, Next steps</b>	The AESO seeks specific input on the timeline and items that might affect the timeline	