



**Implementation of MOF Recommendation Paper  
Stakeholder Comment Form**

Comments From: Suncor  
 Date: April 15, 2009  
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<b>1. WIND POWER FORECASTING – Centralized Forecasting Model</b>	
<p>The AESO recommends that a centralized forecasting model be implemented in Alberta.</p> <p><u>Reasons for Stakeholder Position:</u></p>    	<input type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
<b>2. WIND POWER FORECASTING – RFP ASAP</b>	
<p>The AESO recommends that solicitation (RFP), evaluation and selection of a centralized forecasting service provider should proceed as soon as practicable.</p> <p><u>Reasons for Stakeholder Position:</u></p>    	<input type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
<b>3. WIND POWER FORECASTING</b>	
<p>The AESO will commence consultation on rules, procedures, standards and technical requirements regarding submission of wind generator forecast data/information including; data requirement such as turbine availability and on-site meteorological data, communication protocols, and data quality required from wind generation facilities (or individual forecasters) to deliver forecasts to the AESO.</p>	<input type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent



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Reasons for Stakeholder Position:

### 4. WIND POWER FORECASTING – Data Management

As part of its forecasting research and development work, the AESO will continue work to determine the capability, resources, systems and time required to perform the data management function. In parallel, the AESO will include data management as an optional requirement in the wind forecasting RFP.

- Support
- Oppose
- Indifferent

Reasons for Stakeholder Position:

### 5. FORECASTING ACCURACY

The AESO will monitor forecasting, market and operational results and develop measures of forecasting accuracy. The AESO intends to leverage available data and forecasting resources toward this end.

- Support
- Oppose
- Indifferent

Reasons for Stakeholder Position:



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### 6. FORECASTING - TRANSPARENCY

The AESO considers that system or aggregate wind forecasts should be transparent and made available to all market participants, particularly near term to real time.

- Support  
 Oppose  
 Indifferent

Reasons for Stakeholder Position:

### 7. WIND POWER MANAGEMENT – Curtailment Protocol

The AESO seeks stakeholder feedback on the work group recommendations to use a Potential MW Protocol and specifically would like input from stakeholders regarding practicality and risks associated with this option.

- Support  
 Oppose  
 Indifferent

1. Pro rata allocation of the system wide wind curtailment among Wind Power Facilities (WPF)
2. Use of Potential MW Capability to allocate for each WPF
3. Curtailments should be re-assess and re-allocate every 20 minutes if the limit for any one WPF has changed by greater than 5MW

Reasons for Stakeholder Position:

<b>8. WIND POWER MANAGEMENT - Supply Surplus</b>	
<p>The AESO solicits input from all stakeholders on the proposed supply surplus protocol and proposed modifications to OPP 103 provided below.</p> <p>(1) Include wind power facilities and co-generation facilities in OPP 103 procedures with co-generation to be subject to Minimum Operating Level (MOL) requirements</p> <p>(2) Establish a Minimum Operating Level (MOL) for each asset and, where possible, assets should not be dispatched below their MOL.</p> <p>(3) Refine MOL definition to include new constraints not included in Minimum Stable Generation<sup>1</sup> (MSG) but that affect the asset's ability to operate at or below a threshold. MOL is a physical operating limit (not an economic limit) for an asset constrained by legal/regulatory, environmental, health and safety, equipment reliability, operating level required to serve dispatched ancillary services, or operating level required to prevent damages to third party equipment. Examples of physical operating constraints for types of generation and import/export are included in the WG paper (Appendix A).</p> <p>(4) Develop a mechanism for pool participants to declare and submit the MOL. It is expected that the need for, approach and frequency of declaration may vary among generators and will need to be defined.</p> <p>(5) Revise the current "inflexible block" definition. The definition of "inflexible block" will need to be amended as follows:</p> <p>"inflexible block" means a block of energy that may be dispatched on or dispatched off, but not partially dispatched on, <u>except for a \$0 offer block it may be dispatched to the asset's MOL.</u></p> <p>Definition of "flexible block" does not require any changes since it accommodates the proposed \$0 SMP management protocol.</p> <p>(6) Provide market indication of supply surplus conditions (similar to supply adequacy situations) to provide market participants an opportunity to take voluntary actions in the face of potential \$0 SMP conditions and also become aware that an out-of-market dispatch to clear the energy imbalance could be forthcoming.</p> <p><u>Reasons for Stakeholder Position:</u> Suncor takes the position that the recommendation paper submitted for stakeholder consultation is being processed without appropriate notice to market participants with Cogeneration facilities in an industrial system designation arrangement. This is mostly due to the changes being rolled out under wind integration, which did not clearly articulate the proposed changes to OPP103, and the proposed MOL being imposed on cogeneration facilities.</p>	<p><input type="checkbox"/> Support <input type="checkbox"/> Oppose <input checked="" type="checkbox"/> Indifferent</p>

<sup>1</sup> ISO Rule definition for MSG is "minimum stable generation" which means the minimum generation level that an asset can be continuously operated at without becoming unstable.



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Suncor suggests that the AESO initiate a more detailed review of the proposed changes with respect to OPP 103 with ISD cogeneration based stakeholders to gain a thorough understanding of the definition of MOL, and the impact on the cogeneration facilities.

ISD's are established to provide self generation and steam facilities for reliability and overall systems integrity. The facilities are completely integrated, and normally produce excess MW in order to meet the steam and load demands of the site.

We would like to better understand how the AESO interprets MOL with respect to Cogen facilities where excess MW are produced in order to meet the steam and load demands of the facility, how the MOL is aligned with legislation on the ISD's, and what flexibility is envisioned to support the diverse day to day operational changes required to keep an ISD facility whole.

**9. SUPPLY SURPLUS – protocol**

The Supply Surplus work group also developed the following protocol respecting OPP 103:

- Support
- Oppose
- Indifferent

**Step 1:** Curtail opportunity services including import transactions.

**Step 2:** Take the following actions, taking into account the transmission system operating and reliability constraints and an objective of rotating the curtailments amongst market participants where possible:

- a. Curtail flexible \$0 blocks, by pro-rata assignment,
- b. Where wind generation is required to be curtailed pursuant to (a), assign the curtailment amongst each individual wind power facility using the wind power management protocol,
- c. Curtail inflexible \$0 blocks to the asset's MOL.

**Step 3:** Curtail an asset to 0 MW (go off line), considering the asset's minimum off time.

Reasons for Stakeholder Position:



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### 10. Technical Requirements and Standards

Given the expected difficulty and expense in modifying and/or retrofitting some existing wind power facilities, the WPFTR (s 1.2 g) provided an exemption from the 2004 requirements for any facilities that interconnected under the technical requirements that were in effect prior to November 15, 2004 but specified that these facilities would be required to comply with the WPFTR if the facilities underwent a refurbishment or major upgrade.

- Support
- Oppose
- Indifferent

The AESO considers that this approach is reasonable and prudent but expects that the issue of applicability should be discussed in the rules and standards development and consultation phase. This will include a discussion of the potential grandfathering of certain wind facilities based on the terms and conditions of interconnection agreements and other relevant information.

Reasons for Stakeholder Position:

### 11. ADDITIONAL COMMENTS



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Please return this form with your comments by April 3, 2009 to:

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