

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: ATCO Power

Recommendation	Stakeholder Comments
<p>1 The AESO recommends that steady state dispatch compliance is based on the unit integrated average MW output for each clock 10 minute period</p>	
<p>2 The AESO recommends that the maximum delay time to start ramping be increased to 10 minutes and</p>	
<p>3. Participants submit a ramp profile for each of their generating assets.</p>	
<p>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</p>	<p>ATCO Power made an earlier suggestion that two new mitigating factors be added to Rule 12.6.5. The two mitigating factors are:</p> <ul style="list-style-type: none"> • Actions or inactions that are consistent with the physical capability of the asset operating in accordance with good electric operating practice; and • An acceptable operational reason as defined in the definition <p>ATCO Power acknowledges the AESO’s response that Rule 12.6.5 was recently approved and confirmed and our suggestion may be helpful in developing part of the rule recommendation in section 3.4 of the paper. ATCO Power believes the two additional mitigating factors should</p>

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	<p>pertain to all aspects of Rule 6.6 not just section 3.4 of the original recommendation paper. The new mitigating factors could be added directly into either Rule 6.6 or Rule 12.6.5; ATCO Power views these mitigating factors as a necessary aspect of Rule 6.6.</p>
5. Next steps	