

**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: ATCO Power

<b>Section of Paper</b>	<b>Description</b>	<b>Stakeholder Comments</b>
<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	<p>Rule 12.6.5 on mitigating factors will apply to Rule 6.6 in circumstances where a participant fails to comply with Rule 6.6. To ensure legitimate circumstances are not sanctioned, two additional points should be added to the list of mitigating factors in 12.6.5:</p> <ul style="list-style-type: none"><li>• Actions or inactions that are consistent with the physical capability of the asset operating in accordance with good electric operating practice;</li><li>• An acceptable operational reason as defined in the definition.</li></ul> <p>ATCO Power believes this addition is necessary as all potential circumstances cannot be foreseen and written into Rule 6.6.</p> <p>In the past, discretion has been used in priority ranking of compliance events identified by the AESO. As proposed many violations are still possible. Does the AESO intend to forward all violations for sanction? What are the pre-set criteria?</p>
<b>2.3 Rationale for Changing</b>	The drivers and parameters	ATCO Power agrees with the AESO that the new rule should preserve or

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<b>the Rule</b>	behind the rule change	improve a FEOC market and a reliable system while respecting practical limitations of generating assets.
<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 <math>\pm 5</math>MW allowable dispatch variance should be increased for units operating at their dispatch level.</b>	Recommendation is to change the allowable dispatch variance to 2.5%, minimum of $\pm 5$ MW, maximum of $\pm 10$ MW	<p>ATCO Power appreciates the thorough analysis conducted by the AESO on dispatch variance. We agree with the AESO that a tight dispatch variance aligns with reliability standards.</p> <p>The AESO states the Transmission Reliability Margin (TRM) on the interties can also be minimized allowing more room for imports and exports if generators comply closely with their dispatch. ATCO Power would like the AESO to please elaborate on the possible volume of TRM reduction and conditions that would be necessary in order to achieve a reduction in TRM?</p> <p>Although there appears to be some correlation between operation and unit size, ATCO Power does not see this relationship extending to either cogeneration or smaller sized coal units. While ATCO Power appreciates the simplicity of the design proposed by the AESO, a different dispatch variance for certain unit classes that do not correlate well to maximum capability should be considered.</p> <p>Having the right dispatch variance bounds in place would be more effective</p>

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		than policing generators for incidents of continual operation at an allowable dispatch variance.
<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 $\pm 40\%$	<p>ATCO Power is concerned that using a mean ramp rate will not be adequate in all circumstances. ATCO Power encourages the AESO to undertake a comparison of the proposed mean ramp rates and evaluate the results relative to the proposed rule.</p> <p>Can the AESO please expand upon what is being considered by way of allowances for units that are required to synchronize to the grid in response to a dispatch?</p>
<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.	ATCO Power agrees that the rule should allow for normal fluctuations in output. The AESO has provided some examples of the types of things that would be considered, can the AESO please expand on how these will be written into the rule?
<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.	ATCO Power would like the AESO to explain why a 15 minute provision for generating assets to position before the top of the hour is the best recommendation.
<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.	How will the AESO deal with a unit that has a delay in being able to achieve its desired offered volume? If a unit submits an AOR, they will lose their original dispatch. How can a unit be assured it will be redispached once it's AOR has been resolved assuming their previous offer would still be valid within the T-2 window.
<b>3.8 Participants must comply with small offer block volumes</b>	More stringent rules for small offer blocks and small units.	ATCO Power believes it would be more appropriate to reduce the allowable dispatch variance on units 10 MW and under to ensure a response to a dispatch.

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		More stringent rules for small offer blocks should take operational limitations into consideration.
<b>4. Policy Adherence</b>		
<b>5. Implementation Considerations</b>		
<b>6. Summary of Recommendations</b>		
<b>7, Next steps</b>	The AESO seeks specific input on the timeline and items that might affect the timeline	In addition to having the AESO provide comments, ATCO Power suggests that the AESO hold an additional stakeholder meeting where more clarifying questions can be asked of the AESO prior to the rule being sent to the ERC.