

Stakeholder Comment Form

Alberta Reliability Standards Process

Proposed New Alberta Reliability Standards

Date of Request for Comment: September 9, 2009
Period of Consultation: September 9 through October 9, 2009

Comments From: Capital Power Corporation

Date: October 8, 2009

Contact: Joann Priestley

Phone: 780.392.5542

E-mail: jpriestley@capitalpower.com

Reliability Standard Number	Description	Stakeholder Comments
MOD-016-AB-1.1	Documentation of Data Reporting Requirements for Actual and Forecast Demands, and Net Energy for Load	Capital Power would like the AESO to clarify that the requirements in MOD 016, 017, and 018 do not apply to GFOs or GOPs. Capital Power understands that the AESO uses generation SCADA data to calculate the net energy for load data (AIES) described in R1 of this standard. Although the reliability standard does not indicate applicability to these parties, the requirement for the AESO to calculate net energy for load using generation SCADA data appears to be contradictory.
MOD-017-AB-0.1	Aggregated Actual and Forecast Demands and Net Energy for Load	(See comments in MOD-016-AB-1.1)
MOD-018-AB-0	Treatment of Nonmember Demand Data and how Uncertainties are Addressed in the Forecast of Demand and Net Energy for Load	(See comments in MOD-016-AB-1.1) Capital Power understands that the AESO produces a number of demand forecasts ie. long term load forecast, midterm load forecast and the short term load forecast. Requirement 1.2 requires that the AESO “address assumptions, methods and manner in which uncertainties are treated in the forecasts of aggregated peak demands and net energy for load”. Capital Power understands that the assumptions and methodologies that are used in the long term forecast are

		<p>discussed in the Future Demand and Energy Outlook. However, the AESO does not currently publish all demand forecasts, nor does it address the assumptions and methods as required under R1.2 for all forecasts. Will the AESO be making this information available to the public?</p> <p>Furthermore Capital Power is concerned that, to the extent the AESO uses the long term demand forecast as an input to other metrics produced by the AESO (such as the reserve margin long term adequacy (LTA) metrics contemplated in Rule 13), the AESO is producing and publishing inconsistent results and conclusions. For example, the LTA reserve margin metric utilizes the AESO long term demand forecast and a measure of generation based on existing generation unit capacity and new generation that is already under construction, excluding any future generation build that may be announced or approved, but not under construction. As a result, the AESO calculates a reserve margin assuming that load grows without any limitations but generation is limited to existing or under construction.</p> <p>Capital Power's concern is that the load forecast appears to have a consistent upward bias and is allowed to increase without any limitations, whereas the assumptions around generation additions are much more conservative (only those generating units that are existing or under active construction are included in the metric). As a result the reserve margin metric depicts an overly bearish view of supply adequacy in both the near and long term.</p>
MOD-019-AB-0	Forecasts of Interruptible Demands Data	
TOP-007-WECC-AB-1	System Operating Limits	<p>TOP-007-WECC-AB-1 requires that the AESO manage the System Operating Limits on the BC-AB interconnection. Capital Power recommends that the AESO provide a reference table located on its website that indicates which of the current authoritative documents that outline the procedures that the AESO will use to satisfy its obligation to manage the SOL.</p>

Please return this form with your comments by October 9, 2009, to:
Jason Murray

Manager, Operations Services
E-mail: jason.murray@aeso.ca
Phone: (403) 705-5230
Fax: (403) 705-5252