

Stakeholder Comment Form

Rule 6.6 Review – Recommendation Update

Date of Request for Comment: February 6, 2009
Period of Consultation: January 15, 2009 to February 2, 2009

Stakeholder: Industrial Power Consumers Association of Alberta (IPCAA)

Recommendation	Stakeholder Comments
1 The AESO recommends that steady state dispatch compliance is based on the unit integrated average MW output for each clock 10 minute period	<ul style="list-style-type: none">• No comment
2 The AESO recommends that the maximum delay time to start ramping be increased to 10 minutes and	<ul style="list-style-type: none">• Given the increased time lapse allowed before response to a dispatch, does the AESO intend to monitor generators who consistently approach the maximum delay time?• Will there be an analysis of the cost implications of generators delaying their ramping after receiving dispatch instructions?
3. Participants submit a ramp profile for each of their generating assets.	<ul style="list-style-type: none">• This needs to be auditable by a knowledgeable third party as the tendency will be to use conservative ramp rates to avoid violations
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	<ul style="list-style-type: none">• IPCAA would prefer that the AESO keep loads financially neutral from all ramp rates; however, the addition of deviation and price correlations is a positive step and is endorsed by IPCAA• The Rule needs to be definitive and place the onus on the generator to prove that they are not in violation rather than the AESO having to prove a violation occurred

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level than the dispatch level	
5. Next steps	<ul style="list-style-type: none"> <li data-bbox="705 321 1860 386">• It is important to understand the implications of these Rule changes with respect to the AUC proposed Hearings on Rule 6.6 challenges by EPCOR and TransAlta.