



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

Comments From: IPPSA  
 Date: 17 April 2009  
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<b>1. WIND POWER FORECASTING – Centralized Forecasting Model</b>	
The AESO recommends that a centralized forecasting model be implemented in Alberta.	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
<u>Reasons for Stakeholder Position:</u>	
<b>2. WIND POWER FORECASTING – RFP ASAP</b>	
The AESO recommends that solicitation (RFP), evaluation and selection of a centralized forecasting service provider should proceed as soon as practicable.	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
<u>Reasons for Stakeholder Position:</u>	
<b>3. WIND POWER FORECASTING</b>	
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.	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
<u>Reasons for Stakeholder Position:</u>	
<b>4. WIND POWER FORECASTING – Data Management</b>	
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.	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
<u>Reasons for Stakeholder Position:</u>	



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<b>5. FORECASTING ACCURACY</b>	
<p>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.</p>	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
<p><u>Reasons for Stakeholder Position:</u></p> <p>IPPSA would support benchmarking the accuracy of the forecast data and the market and operational results, as well as the AESO's role as data manager, should this materialize.</p>	
<b>6. FORECASTING – TRANSPARENCY</b>	
<p>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.</p>	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
<p><u>Reasons for Stakeholder Position:</u></p> <p>So long as the forecast data is provided as aggregate information, this appears consistent with how other facility information is provided, eg. outages.</p>	
<b>7. WIND POWER MANAGEMENT – Curtailment Protocol</b>	
<p>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.</p>	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose <input type="checkbox"/> Indifferent
<ol style="list-style-type: none"> <li>1. Pro rata allocation of the system wide wind curtailment among Wind Power Facilities (WPF)</li> <li>2. Use of Potential MW Capability to allocate for each WPF</li> <li>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</li> </ol>	
<p><u>Reasons for Stakeholder Position:</u></p> <p>IPPSA has three broad recommendations:</p> <p>1) As a general approach, IPPSA would prefer it if the AESO were to examine market solutions to market problems, rather than rely on directives and involuntary curtailments. As an example, could a voluntary constrained down mechanism be considered, rather than pro-rata curtailment?</p> <p>2) Perhaps a Wind-Following AS product can be developed to seek fast-acting loads and supplies to respond, as an early step to resolve any ramping issue. Again, this would be a</p>	



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more market-based solution, rather than relying on directives.

3) The AESO should clearly define the conditions for invoking Wind Power Management (WPM). As a high-level principle, WPM should be limited to system operations issues clearly attributed to wind. There is a concern from IPPSA’s wind members that WPM may be used to manage other system issues, not necessarily those caused by wind producers.

**8. WIND POWER MANAGEMENT - Supply Surplus**

The AESO solicits input from all stakeholders on the proposed supply surplus protocol and proposed modifications to OPP 103 provided below.

- Support
- Oppose
- Indifferent

- (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
- (2) Establish a Minimum Operating Level (MOL) for each asset and, where possible, assets should not be dispatched below their MOL.
- (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).
- (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.
- (5) Revise the current "inflexible block" definition. The definition of "inflexible block" will need to be amended as follows:  
  
 "inflexible block" means a block of energy that may be dispatched on or dispatched off, but not partially dispatched on, except for a \$0 offer block it may be dispatched to the asset's MOL.  
  
 Definition of "flexible block" does not require any changes since it accommodates the proposed \$0 SMP management protocol.
- (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.

<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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### Reasons for Stakeholder Position:

We would prefer a market solution to this perceived market problem, rather than involuntary curtailments. One idea would be to create a modified DDS product, where must-run generators can pay a volunteer to curtail supply.

### **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:

We believe that OPP 103 should be the subject of a separate consultation process.

We would also support a market solution to this market problem, rather than involuntary curtailments.



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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**

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

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