

Allison Mathews

From: Sherra Zulerons [Sherra.Zulerons@mainstreamrp.com]
Sent: Monday, April 20, 2009 11:15 AM
To: Allison Mathews
Subject: Additional comment-MOF

Hi Allison,

I know the deadline has passed but in further consultation with our consultants and staff we would like to amend our March 20th comments with the italicized writing below.

The MOF document is not really helpful in determining what impact RAS will have on our proposed Oldman facility availability specifically. It speaks more to AESO philosophy and a few technical details on how AESO plans on allocating run-backs among affected parties fairly. MRP would suggest that what is needed by the generators affected is a concerted effort on the part of the AESO to provide expected availability impact alongside the RAS requirements. This is effort and data intensive, and currently the AESO does not offer up this data as part of the final Interconnection Proposal (IP) that is accepted by the Generator in order to connect. MRP believes that the AESO is best suited to this work, in the interim and in lieu of a full analysis we believe that as part of the final IP that the AESO should make statistical line outage data publicly available. Specifically Allison we would like our March 20th submission amended to include the following

Since generators are being increasingly subjected to run-back due to Remedial Action Schemes put in place to maintain network reliability, it is extremely important for these generators to understand the extent to which their availability may be reduced, and the economic impact resulting from the decreased availability. It seems fair that the AESO, having the best knowledge of historical load levels and statistical line outage information in their control area, would provide this availability information alongside any proposed remedial action schemes affecting a generator as included in the final Interconnection proposal. At least, base cases with typical seasonal load levels and historical line and generator outage data should be made public so that the generators may attempt to ascertain worst-case availability figures due to RAS. Additionally, if the generator is to try and determine the effect of RAS on their own availability, the network conditions that would result in any RAS being applied should be explicitly defined.

Sherra Zulerons
General Manager, Canada

Mainstream Renewable Power Ltd.
125 Lakeshore Rd E, Suite 202
Mississauga, Ontario, Canada L5G 1E5
Direct: + 905.278.7677 (ext: 101)
Cell: + 905.407.7118
Fax: + 905.278.3270
sherra.zulerons@mainstreamrp.com
www.mainstreamrp.com

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