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Via Email

Colleen Fairhead
Senior Market Analyst
Alberta Electric System Operator
2500, 330 – 5th Ave S.W.
Calgary, AB T2P 0L4

RE: Comments on Export Must Run Service Discussion Paper

Dear Ms. Fairhead;

We appreciate the opportunity to provide feedback on the AESO's Export Must Run Service Discussion Paper (the Paper).

We support the concept of using southern Alberta generators to increase export capability. However, we do not support your concept of voluntary XMR service. We believe that your proposal, as it is currently written, assigns risk to the service provider, be it price risk, credit risk, or operational risk. We believe that these risks should not lie with the provider of a system support service, but with the purchaser of the service and/or the manager of the system.

At a principle level we believe that any XMR solution should not discriminate between service providers and that, similar to the DOE's direction on TMR, any effect XMR has on the pool price must be removed.

In Section 4.4 of the Paper you mention the concepts of XMR as a service for a fee and XMR as an ancillary service. We believe that these concepts are more appropriate for a system support service and would like to explore these further.

As the Balzac Power Station is one of the southern Alberta generators mentioned in the Paper we were surprised that we had not been consulted with prior to the Paper being published. We look forward to being included in any further stakeholder consultation on this subject.

Regards,

Original signed by

Howie Thomas,
Asset Optimizer - Power