



May 26, 2009

To: Market Participants and Interested Parties

**Re: Re-draft of ISO Rule 6.6 Pool Participant Non-Compliance with Energy Market Dispatch and Directives for Consultation**

Please be advised that our [Letter of Notice](#) dated May 26, 2009, containing a re-draft of ISO Rule 6.6 is now posted on the AESO website for comment by market participants and interested parties. The re-drafted rule along with a comment matrix may be accessed on the AESO website at <http://www.aeso.ca> by following the path Rules & Standards > ISO Rules > Proposed ISO Rules & OPP changes.

The re-draft is part of the consultation on ISO Rule 6.6. It was preceded by an October 30, 2008 [AESO Recommendation paper – Rule 6.6 Review](#), a January 15, 2009 [Review Update](#) and a [draft ISO Rule 6.6](#) posted for consultation on March 5, 2009. These documents are all available on the AESO website for your review.

In addition to the posting of re-drafted ISO Rule 6.6 the AESO has posted the [comment response matrix](#) for the March 5, 2009 draft rule.

Based on the comments received on the March 5, 2009 draft, the AESO has made some significant changes to rule 6.6 as reflected in the re-draft. The following table highlights the changes between the March 5, 2009 draft and the May 26 2009 re-draft.

Rule section	March 5 Version	May 26 Version	Reason for Change
Definitions	A number of definitions were included in rule 6.6 and two were also included (one new and one revised) in the Definitions section of the rules.	The revision to minimum stable generation has been dropped because the intent is covered elsewhere in the rule. The definition for ADV has been removed from the Definitions section of the rules and included in rule 6.6. All definitions for 6.6 have been grouped at the beginning of rule 6.6.	This change was to provide better structure and clarity.
6.6.1 Compliance	Section based on current rule and	Reference to ISO monitoring functions	Section revised to provide clarity

<b>Rule section</b>	<b>March 5 Version</b>	<b>May 26 Version</b>	<b>Reason for Change</b>
responsibilities	included ISO monitoring functions	removed. Focus on participant responsibilities. Introduction of standard of practice and what is essentially a due diligence defence for pool participants.	regarding dispatch compliance responsibilities.
6.6.2 Steady state compliance	Uses ADV and 10 minute clock period.	Minimal changes from March 5	Changes made for clarity.
6.6.3 Ramping Compliance	Ramping –uses a ramp profile. Several participants stated it was too restrictive and might be technically deficient.	Worked with participants and the result is a hybrid of the ramp time plus or minus the greater of 40% or five minutes. This allows some variance on long and short ramps and multi-unit assets which was a concern for participants	Changes made to allow ample opportunity to comply with ramping requirements given the diverse challenges faced by the various types of generating assets.
6.6.4 Operational Deviation Dispatch Relief	Allows for deviation from dispatch level or ramp rate. Sets out communication and restatement requirements.	Re-organized. No major content change.	Changes made for clarity.
6.6.5 Exceptions	Sets out a number of specific exceptions.	Modified introduction to align with new 6.6.1 and include operational deviation as an exception.	Changes made to provide better alignment with the rest of the rule.

If you have any questions regarding the process or the re-draft rules please contact Doug Simpson at 403 539-2494.

Yours truly,

Doug Simpson  
Director, Market Operations