

ISO Rule 6.6 Review

Stakeholder Session June 24, 2008

Reliable **Power**

Reliable **Markets**

Reliable **People**



ISO Rule 6.6 - Purpose of this meeting



- Working session – looking for stakeholder input
- Review issues related to rule 6.6 that have been identified by participants
- Identify other issues related to rule 6.6
- Discuss possible solutions

ISO Rule 6.6 - Out of scope for this meeting



- Specified penalties
- The compliance and enforcement process
- Rules other than 6.6

ISO Rule 6.6 – Proposed Guiding Principles



- Rule 6.6 must:
 1. Align with reliability standards
 2. Support market integrity
 3. Be practical and attainable

ISO Rule 6.6 – Issues already identified



1. PPA buyers do not control the plant and cannot be held accountable for non-compliance
2. The ± 5 MW is too tight onerous on generators – particularly large ones
3. System conditions require governor action that would put units out of compliance, e.g., frequency excursions
4. Time is required to receive, evaluate and respond to a dispatch
5. Currently the rule requires instantaneous compliance with dispatch i.e., no time for ramping
6. The rule does not recognize the operational challenges when ramping from 0 MW to minimum stable output.
7. Other - ???

ISO Rule 6.6 – Proposed plan



- Week of July 14th – issue discussion paper for participant comment
- August 8th – comments on paper due from participants
- August 29th – reply to paper comments and issue draft rule. Follow normal ISO rules process.
- January 2009 – approved by the ERC and file with AUC
- From that point on – AUC process as necessary. Modify compliance tools to fit new rule.