

Section 103.13 Request for Reconsideration

Period of Comment:	October 26, 2018	through	November 14, 2018	Contact:	Surendra Singh
Comments From:	Alberta Newsprint Company			Phone:	780-778-1537
Date [yyyy/mm/dd]:	2018/11/14			Email:	surendras@albertanewsprint.com

Please include any suggestions for alternative rule wording and accompanying rationale in the table below. Cut and paste the existing rule wording into column one below and track in your changes.

Blackline of Suggested Rule Wording	Rationale
<p>Reconsideration Decision</p> <p>6 The ISO must review the request for reconsideration and issue a written decision to the person or the Market Surveillance Administrator making the request for reconsideration within 5 business days of receiving the request referred to in subsection 2.</p> <p>7 The ISO must, as soon as reasonably practicable, upon making a decision regarding a request for reconsideration received from the Market Surveillance Administrator, provide a copy of the reconsideration decision to the Market Surveillance Administrator and any directly affected person.</p> <p>8 The ISO must, as soon as reasonably practicable, upon making a decision regarding a request for reconsideration received from a person, provide a copy of the reconsideration decision to:</p> <p>(a) the person who submitted the request; and</p> <p>(b) the Market Surveillance Administrator if, in the opinion of the ISO, the request for reconsideration relates to fair, efficient, and open competition in the capacity market.</p>	<p>Reconsideration will likely take more than 5 days to allow collaboration, particularly around the initial UCAP setting process. ANC suggests that more time should be provided except in those instances where the timeline must be short due to other process issues. However, in some instances the auction timelines provide several months that could be utilized to allow a fulsome dispute resolution process with an exchange of data, rationale and other factors that could be considered.</p> <p>ANC would further request the ability to work with the AESO prior to the determination of the initial UCAPs. ANC expects the calculation of UCAPs for DR to be complex in the transitional period and suggests that the process will go more smoothly if ANC is able to work directly with the AESO.</p>

Section 203.4, Delivery Requirements for Energy

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Blackline of Suggested Rule Wording	Rationale
<p>4(1) A pool participant must move the output of a generating source asset or the consumption of a load sink asset which is:</p> <ul style="list-style-type: none"> (a) the subject of a dispatch; and (b) ramping towards the MW level indicated in that dispatch within 10 minutes of the time specified in the dispatch but not prior to the time specified in the dispatch. 	<p>As a GLR (Guaranteed Load Reduction) demand response asset, ANC can meet this requirement when dispatched down, i.e. when the load reduction is supplied to the market to meet capacity needs. However, when the load is dispatched back up ANC load is in effect 'long lead time'. ANC has attached a table below indicating expected lag times and ramp rates for each block available from the facility. As noted, ANC can fully meet its dispatch for each block within 10 minutes, though unlike a generator there is not a smooth 'ramp' through this range.</p> <p>As illustrated in the attached table, ANC has a lead time of 30 minutes to 120 minutes for ramping its load back online. This rule should apply only to the load reduction portion of the energy delivery. ANC understands that the AESO will require visibility of the timing load will return to the grid but it is unclear from this rule the mechanism that will allow ANC to participate when load is dispatched back online. Do the rules for restating available capacity support the long lead time requirements of ANC's load returning online?</p> <p>Please confirm that the rule as written does not preclude ANC from participating as a GLR demand response asset given the characteristics in the included table and that the overall dispatch rules will allow the long lead time nature of the asset to be properly reflected.</p>
<p>4(2) A pool participant must ensure that each generating source asset or load sink asset reaches the MW specified in an energy market dispatch, plus or minus the allowable dispatch variance for that generating source asset or load sink asset in:</p>	<p>Please confirm that the intent of this rule is that compliance will be assessed based on the timing that the load reaches the required consumption level regardless of the actual ramp rate. In effect, if the ramp rate submitted implies ANC has 8 to 14 minutes to reach a given dispatch level (as an example), it does not matter how the facility reaches this level as long as it does within the specified timeframe.</p>

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<p>(a) no longer than the period of time calculated as follows:</p> <p>(i) divide the change in dispatch MW by the ramp rate the pool participant submits;</p> <p>(ii) add 40% of the time calculated in subsection</p> <p>4(2)(a)(i) or 5 minutes, whichever is greater; and (iii) add the 10 minutes referred to in subsection 4(1);</p> <p>and (b) no sooner than the period of time calculated as follows: (i) divide the change in dispatch MW by the ramp rate the pool participant submits; and (ii) subtract 40% of the time calculated in subsection</p> <p>4(2)(b)(i) or 5 minutes, whichever is greater.</p>	

Alberta Newsprint Load Dispatches - Ramp Table					
Load Dispatch Down					
	Dispatched Down Load (MW)	Online Load (MW)	Flexible or Inflexible	Time (minute)	Ramp Rate
No major equipment down	0	115			
Block 1 dispatched down	25	90	Inflexible	10	23 MW come off in 7 min, remaining 2 MW in 10 min
Block 1 & 2 dispatched down	50	65	Inflexible	10	23 MW come off in 7 min, remaining 2 MW in 10 min
Block 1, 2 & 3 dispatched down	75	40	Inflexible	10	23 MW come off in 7 min, remaining 2 MW in 10 min
Block 1, 2, 3 & 4 dispatched down	89	26	Inflexible	10	14 MW come off in 10 min
Block 1, 2, 3, 4 & 5 dispatched down	110	5	Inflexible	10	Load will come off gradually
Load Dispatch Up					
	Dispatched Up Load (MW)	Online Load (MW)	Flexible or Inflexible	Time (minute)	Ramp Rate
Minimum Consumption Level		5			
Block 1 dispatched Up	25	30	Inflexible	upto 120	Given weather and process conditions (winter/snowing, minimum consumption), it may take upto 120 min before the Block 1 load can come up online. 5 MW load will increase gradually but remaining 20 MW will increase rapidly (in less than 1 minutes) once started.
Block 1 & 2 dispatched Up	50	55	Inflexible	upto 30	Upto 2 MW will come up within 10 min. Remaining 23 MW may take upto 30 min and will ramp up quickly (in less than 1 minutes) once started.
Block 1, 2 & 3 dispatched Up	75	80	Inflexible	upto 30	Upto 2 MW will come up within 10 min. Remaining 23 MW may take upto 30 min and will ramp up quickly (in less than 1 minutes) once started.
Block 1, 2, 3 & 4 dispatched Up	89	94	Inflexible	upto 30	Load will come up gradually and may tke upto 30 minutes.
Block 1, 2, 3, 4 & 5 dispatched Up	110	115	Inflexible	upto 30	Load will come up gradually and may tke upto 30 minutes.

206.3 Uniform Capacity Value Determination

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Blackline of Suggested Rule Wording	Rationale
<p>(5) The ISO must, subject to subsection 8, calculate a uniform capacity value for a load asset providing firm consumption level as follows:</p> <p>(a) identify the metered energy for the settlement intervals with the same hour ending as the hour in the historical data set which must be either:</p> <p>(i) the 15 most recent business days prior to the day with the hour in the historical data set if the hour falls on a business day;</p> <p>(ii) the 10 most recent weekend days or holidays prior to the day with the hour in the historical data set if the hour falls on a weekend day or a holiday; or</p> <p>(iii) the days the ISO specifies if, in the 45 day period prior to the day with the hour in the historical data set, there are fewer than 15 business days and 10 weekend days when days containing settlement intervals identified in subsection 6(b) are excluded;</p> <p>(b) determine if any settlement intervals referred to in subsection 6(5)(a):</p> <p>(i) occurred on days containing availability hours referred to in Section 206.8 of the ISO rules, Obligation Period Performance Assessment;</p>	<p>ANC agrees with this new approach. The cornerstone of the success of this methodology is the clause that allows for the calculation of metered energy “including the addition to the metered energy the volume of the directive for ancillary services or the volume for dispatch in the settlement intervals identified in accordance with” hours that “occurred on days containing hours in which the asset was subject to a directive for ancillary services or the asset received dispatch for an amount greater than 0 MW”, as per section 6(5)(b)(iv) and 6(5)(c)(ii)</p> <p>ANC, would however, point out a typo. In 6(5)(c)(ii)</p> <p>(ii) including the addition to the metered energy the volume of the directive for ancillary services or the volume for dispatch in the settlement intervals identified in accordance with subsection 6(5)(b)(iv);</p>

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<p>(ii) occurred on days containing delivery hours referred to in Section 206.8 of the ISO rules, Obligation Period Performance Assessment;</p> <p>(iii) occurred on days containing hours identified in subsection 4(1); or</p> <p>(iv) occurred on days containing hours in which the asset was subject to a directive for ancillary services or the asset received dispatch for an amount greater than 0 MW;</p> <p>(c) calculate the average hourly metered energy where hourly metered energy is the metered energy for the settlement intervals referred to in subsection 6(5)(a):</p> <p>(i) excluding the metered energy for the settlement intervals identified in subsections 6(5)(b)(i), 6(5)(b)(ii) and 6(5)(b)(iii); and</p> <p>(ii) including the addition to the metered energy the volume of the directive for ancillary services or the volume for dispatch in the settlement intervals identified in accordance with subsection 6(5)(b)(iv);</p> <p>and</p> <p>(d) calculate the qualified baseline in accordance with the following formula:</p> $\text{qualified baseline} = \frac{\text{total metered energy}}{\text{settlement intervals}}$ <p>where:</p> <p>(i) total metered energy is the average of all the hourly metered energy values from subsection 6(5)(c) for each of the hours in the historical data set; and</p> <p>(ii) settlement intervals is the number of hours in the historical data set determined in subsection 6(5)(a).</p>	
Test Requirement for Load Assets	ANC supports the language in this section.

Blackline of Suggested Rule Wording	Rationale
<p>8(1) A capacity market participant must demonstrate to the ISO the ability of a load asset that was subject to a capacity commitment in the immediately preceding obligation period to reduce consumption of electric energy reflecting the uniform capacity value and maintain the reduction for 1 hour if, in the obligation period prior to obligation period for which the ISO is calculating a uniform capacity value in accordance with subsection 7(5), the following was not observed:</p> <p>(a) there were no delivery hours as referred to in Section 206.8 of the ISO rules, Obligation Period Performance Assessment; and</p> <p>(b) the asset did not reduce consumption in response to an energy market dispatch or ancillary services market directive to reflect the uniform capacity value for the load asset.</p> <p>(2) The ISO must, in the event that the load asset fails the demonstration in subsection 8(1), reduce the uniform capacity value for the asset to reflect the observed load reduction in 8(1).</p>	