

Stakeholder Comments and AESO Replies Matrix



Proposed Amended Section 203.4 of the ISO Rules, *Delivery Requirements for Energy*

Date of Request for Comment:	October 26, 2018		
Period of Comment:	October 26, 2018	through	November 14, 2018

Stakeholder Comments and/or Proposed Alternative Rule Wording	AESO Replies
Applicability Subsection 1	
<p><u>Capital Power Corporation (“Capital Power”)</u></p> <p>Capital Power understands that load sink assets are to submit bids and, therefore, suggests that the term “bid” replace the term “offer” for consistency.</p> <p>Subsection 1(b)</p> <ul style="list-style-type: none"> a pool participant with a load sink asset that has an associated current offer bid when participating in the energy market; 	<p>Please see the AESO’s reply on subsection 3(1) of the AESO Replies to Amended Section 203.1, <i>Offers and Bids for Energy</i> matrix.</p>
Ramping Compliance Subsection 4(1)	
<p><u>Alberta Newsprint Company (“ANC”)</u></p> <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>Load assets that provide guaranteed load reduction must ensure that they are capable of providing any un-dispatched volume from their current state, and if not, must restate their available capability to reflect their operational conditions. The definition of “acceptable operational reason” covers physical or operational constraints associated with an asset.</p>

Stakeholder Comments and/or Proposed Alternative Rule Wording	AESO Replies
<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>	

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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.	

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<p>Subsection 4(2)</p>	
<p><u>Alberta Newsprint Company (“ANC”)</u></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>	<p>The AESO confirms that the current rule only stipulates minimum and maximum times to achieve dispatch level, within the allowable dispatch variance. There are currently no requirements for an asset to move its output at the ramp rate provided as per Section 203.1, <i>Offers and Bids for Energy</i>.</p>
<p>Operational Deviation</p> <p>Subsection 5(1)</p>	
<p><u>Capital Power Corporation (“Capital Power”)</u></p> <p>Capital Power remains supportive of the 50 MW threshold that was previously included as part of the initial draft rule. The threshold clearly delineates when, in the face of an operational deviation, a market participant is expected to verbally inform the ISO. As such, Capital Power recommends reinstating the originally proposed language from the initial draft amended rule.</p> <p>Subsection 5(1)</p> <ul style="list-style-type: none"> • A pool participant must, if a generating source asset or load sink asset experiences an operational deviation in excess of 50 MW, verbally inform the ISO as soon as practical of the occurrence of the operational deviation and provide a description of the cause if known. 	<p>The AESO does not agree with the suggested change at this time. The change is outside the scope of required ISO rule amendments for the implementation of the capacity market.</p>

Please provide your comments on the following (as set out in AUC Rule 017 s. 13(b-j)):

Item #		Stakeholder comments	AESO Replies
1	whether you agree that Section 203.4 of the ISO Rules, <i>Delivery Requirements for Energy</i> relates to the capacity market and why or why not	<u>Capital Power Corporation (“Capital Power”)</u> Capital Power agrees that the proposed rule changes relate to the implementation and operation of the capacity market.	The AESO acknowledges Capital Power’s comment.
2	whether you agree that Section 203.4 of the ISO Rules, <i>Delivery Requirements for Energy</i> should or should not be in effect for a fixed term and why or why not	<u>Capital Power Corporation (“Capital Power”)</u> Capital Power does not see any rationale for prescribing a fixed term for the proposed rule and, as such, believes that the proposed rule should not be in effect for a fixed term. This will provide needed certainty to market participants regarding the longevity of the capacity market rules and design.	The AESO acknowledges Capital Power’s comment.
3	whether you understand and agree with the objective or purpose of Section 203.4 of the ISO Rules, <i>Delivery Requirements for Energy</i> and whether, in your view, Section 203.4 of the ISO Rules, <i>Delivery Requirements for Energy</i> meets the objective or purpose	<u>Capital Power Corporation (“Capital Power”)</u> Capital Power has no comments at this time.	
4	how, in your view, Section 203.4 of the ISO Rules, <i>Delivery Requirements for Energy</i> affects the performance of the capacity market and the electricity market	<u>Capital Power Corporation (“Capital Power”)</u> Capital Power has no comments at this time.	
5	your views on any analysis conducted or commissioned by the AESO supporting Section 203.4 of the ISO Rules, <i>Delivery Requirements for Energy</i>	<u>Capital Power Corporation (“Capital Power”)</u> Capital Power is not aware of any analysis conducted or commissioned by the AESO supporting the proposed amendments to this ISO rule. As such, Capital Power has no comments at this time.	

6	whether you agree with Section 203.4 of the ISO Rules, <i>Delivery Requirements for Energy</i> taken together with all ISO rules and in light of the principle of a fair, efficient and openly competitive market	<u>Capital Power Corporation (“Capital Power”)</u> Capital Power has no comments at this time.	
7	whether you would suggest any alternatives to Section 203.4 of the ISO Rules, <i>Delivery Requirements for Energy</i>	<u>Capital Power Corporation (“Capital Power”)</u> Capital Power has no comments at this time.	
8	whether you agree that the proposed provisional rule supports ensuring a reliable supply of electricity at a reasonable cost to customers and why or why not	<u>Capital Power Corporation (“Capital Power”)</u> Capital Power has no comments at this time.	
9	whether you agree that the proposed provisional rule supports the public interest and why or why not	<u>Capital Power Corporation (“Capital Power”)</u> Capital Power has no comments at this time.	
10	whether you have any additional comments	<u>Capital Power Corporation (“Capital Power”)</u> Capital Power has no further comments at this time.	