

Market Participant Comment Matrix – April 16, 2018

Amendments to “acceptable operational reason” Definition



Date of Request for Comment: <u>April 16, 2018</u>	Contact: <u>Kurtis Glasier</u>
Period of Comment: <u>April 16, 2018</u> through <u>May 2, 2018</u>	Phone: <u>(403) 513-3576</u>
Comments From: <u>ATCO</u>	Email: <u>Kurtis.Glasier@atco.com</u>
Date [yyyy/mm/dd]: <u>2018/05/02</u>	

Listed below is the summary description of changes for the proposed amended “acceptable operational reason” definition. Please place your comments/reasons for position underneath (if any).

Definitions – Amended			
Existing	Proposed	Current ISO Rules that contain definition	Market Participant Comments and/or Alternate Proposal
<p>“acceptable operational reason” means, any one (1) or more of the following:</p> <ul style="list-style-type: none"> (i) a circumstance related to the operation of a generating source asset which if it operated could reasonably be expected to affect the safety of the source asset, the environment, personnel working at the source asset or the public; (ii) re-positioning a generating source asset assets, within the energy market due to the need to meet a dispatch given to that source asset from the ISO to serve the stand-by operating reserves market; (iii) re-positioning a generating source asset within the energy 	<p>“acceptable operational reason” means, any one (1) or more of the following:</p> <ul style="list-style-type: none"> (i) a circumstance related to the operation of a generating source asset which if it operated could reasonably be expected to affect the safety of the source asset, the environment, personnel working at the source asset or the public; (ii) re-positioning a generating source asset assets, within the energy market due to the need to meet a dispatch given to that source asset from the ISO to serve the stand-by operating reserves market; (iii) re-positioning a generating source asset within the energy 	<p>Section 201.4, <i>Submission Methods and Coordination of Submissions</i>;</p> <p>Section 202.4, <i>Managing Long Lead Time Assets</i>;</p> <p>Section 203.1, <i>Offers and Bids for Energy</i>;</p> <p>Section 203.3, <i>Energy Restatements</i>;</p> <p>Section 203.6; <i>Available Transfer Capability and Transfer Path Management</i>; and</p> <p>Section 204.3, <i>Dispatch Down Service Restatements</i></p>	<p><i>Comment # 1:</i> ATCO is concerned that the proposed changes have unintended consequences. The primary concern with the proposed changes is implications for generators when applying ISO Rule 505.2, <i>Performance Criteria for Refund of Generating Unit Owner’s Contribution</i>. Without further amendment or clarity, ATCO’s understanding is that due to a transmission outage, a generator would be forced to restate its AC to zero using an AOR. This restatement would affect the generator’s average hourly availability calculated in accordance with ISO Rule 505.2; had the transmission outage not occurred the generator would have been fully available as reflected by its AC before the AOR.</p> <p>ATCO is also concerned about the implication of a perceived lower historical availability for a generator due to transmission outages, and the effect this has on the generator’s capacity value determination in the upcoming capacity market transition. It doesn’t seem consistent that a generator would receive a lower capacity value due to transmission or distribution outages, which are outside of its control/ability to perform.</p> <p>ATCO requests clarity from the AESO regarding the effect of the proposed AOR restatements on: the Generating Unit Owner’s Contribution (GUOC)</p>

<p>market to manage physical or operational constraints associated with the source asset;</p> <p>(iv) re-positioning a pool asset that is an import asset or an export asset within the energy market to manage physical or operational constraints associated with an interconnection or a neighbouring balancing authority;</p> <p>(v) a circumstance directly resulting in the generating source asset not being capable of operation, which circumstance was solely caused by an occurrence of force majeure; or</p> <p>(vi) re-positioning a generating source asset for electric energy that is:</p> <p>a) produced on the property of which a person is the owner or a tenant; and</p> <p>b) consumed solely by that person and solely on that property.</p>	<p>market to manage physical or operational constraints associated with the source asset;</p> <p>(iv) re-positioning a pool asset that is an import asset or an export asset within the energy market to manage physical or operational constraints associated with an interconnection or a neighbouring balancing authority;</p> <p>(v) a circumstance directly resulting in the generating source asset not being capable of operation, which circumstance was solely caused by an occurrence of force majeure; or</p> <p>(vi) re-positioning a generating source asset for electric energy that is:</p> <p>a) produced on the property of which a person is the owner or a tenant; and</p> <p>b) consumed solely by that person and solely on that property; or</p> <p>(vii) re-positioning a generating source asset within the energy market in response to:</p> <p>a) a distribution constraint that causes a limitation to the normal economic merit operation of the source asset, or to the flow of electrical energy from the source asset from one part of the electric distribution system to the other; or</p>		<p>refund calculation, and the capacity value determination based on a generator's availability.</p>
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	b) a transmission outage that results in the source asset being electrically disconnected from the transmission system .		
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