Market Participant Comment Matrix – September 28, 2017

Proposed Amended Section 205.4, *Regulating Reserve Technical Requirements and Performance Standards* ("amended Section 205.4")

aeso ALBERTA ELECTRIC SYSTEM OPERATOR

Date of Request for Comment: September 28, 2017	**Contact:** Kurtis Glasier
Period of Comment: September 28, 2017 through October 13, 2017	**Phone:** (403) 513-3576
Comments From: ATCO	Email: Kurtis.Glasier@atco.com
Date [yyyy/mm/dd]: 2017/10/13	

Listed below is the summary description of changes for the proposed amended Section 205.4. Please refer back to the Letter of Notice under the "Attachments to Letter of Notice" section to view the actual proposed content changes to the ISO rules. Please place your comments/reasons for position underneath (if any).

ISO Rules	Market Participant Comments and/or Alternate Proposal
Amended The AESO is seeking comments from market participants with regard to the following matters: 1. Do you agree or disagree with the proposed amended Section 205.4? If you disagree, please provide comments. 2. Are there any subsections where the language does not clearly articulate the requirement for either the AESO or a market participant? If yes, please indicate the subsections and suggest language that would improve the clarity.	ATCO disagrees with the proposed amendment in Section 205.4, specifically subsection 6(1)(c). ATCO currently has units that have load controllers where the load setpoint is based on the required combined energy, regulating, spinning and supplemental reserve settings. This setpoint is sent to the load controller instantaneously and the load controller combines this signal with all of the governor functions to control the ramping. Some OEM electrohydraulic digital governor controllers may not act upon simultaneous raise and lower demands either from governor functions (speed droop) or external AGC; in this case, a lower demand will override a raise demand. ATCO's concern is that the response requested in Appendix 1 of Section 205.4 during ramping of the unit may not be achievable under specific conditions: if there is a frequency based raise demand while there is also an AGC lower demand at the same time. It will be same in the opposite direction as well.