

Market Participant Comment Matrix – September 28, 2017



Proposed Amended Section 205.5, *Spinning Reserve Technical Requirements and Performance Standards* (“amended Section 205.5”)

Date of Request for Comment: <u>September 28, 2017</u>	Contact: <u>Kurtis Glasier</u>
Period of Comment: <u>September 28, 2017</u> through <u>October 13, 2017</u>	Phone: <u>(403) 513-3576</u>
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Date [yyyy/mm/dd]: <u>2017/10/13</u>	

Listed below is the summary description of changes for the proposed amended Section 205.5. 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 205.5? 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.	<p>1. ATCO disagrees with the the proposed amendment in Section 205.5, specifically subsection 3 (b) (iii).. Governor and operating design under some load conditions will prevent the required frequency response with our existing droop settings. The proposed limits on droop setting requirements will prevent some of our units that currently provide spinning reserve from being capable of providing spinning reserve in the future... ATCO requests clarification if there will be some provision within the rule to allow spinning reserve offers under prescribed load conditions or for units that are grandfathered due to unit design?</p> <p>2. ATCO is seeking clarity on the language used in Section 205.5, specifically subsection 6(3).</p> <p>For a combined cogeneration station, which bids into the spinning reserve market as a single combined unit, the associated steam turbines typically operate with a steam header pressure control, where the Steam Turbing Generator (STG) governor is deadbanded and it does not respond to frequency.</p> <p>For stations configured like this, can the Gas Turbine subunit (GT) be the only significant responder to the frequency, where the GT would provide the remaining head room? The GT would respond to its own droop and also make up for the lack of STG frequency response, going further then ramping back when steam production eventually changes allowing STG output to increase.</p> <p>In this case, ST will not directly responded to the frequency but the combine unit will still meet the requirement. ATCO requests clarity from the AESO that the “each spinning reserve resource” as used in Section 205.5 6 (3) would it require individual STG and GT subunit to meet the requirements or combined STG and GT can act as single unit and comply with the requirements.</p>