

Date of Request for Comment: <u>April 7, 2017</u> Period of Comment: <u>April 7, 2017</u> through <u>May 5, 2017</u> Comments From: <u>Aura Power Renewables Ltd</u> Date [yyyy/mm/dd]: <u>2017-05-05</u>	Contact: <u>Joe Peters</u> Phone: <u>403-875-8984</u> Email: <u>joe.peters@petersenergy.com</u>
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Listed below is the summary description of changes for the proposed amended Section 304.3. 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).

1. 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 304.3? 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><i>Comment # 1: Insert Comments / Reason for Position (if any)</i></p> <p>We are concerned about subsection 3(7) which states: <i>“The legal owner of a wind or solar aggregated generating facility must ensure that the default setting for the ramp rate limiting controls referred to in subsection 3(5) is set at 10% of the gross real power capability, unless otherwise approved by the ISO in writing.”</i></p> <p>We would require clarification of the timeframe is (10% per minute, 5 minutes etc.) We expect the ramp up limit is achievable for Solar PV, but will cause a reduction in yield, which ultimately increases costs to the consumer. We cannot reasonably apply a ramp down limit. Technically it would only be possibly by permanently curtailing active power by approximately 10%, causing a greater than 10% yield loss. This is a very significant impact. We encourage the AESO to identify and quantify what risk or cost is being mitigated by the ramp limits on Solar PV and seek alternative methods to mitigate those costs and risks, once quantified.</p>