

Market Participant Comment Matrix – September 28, 2017



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

Date of Request for Comment: <u>September 28, 2017</u>	Contact: <u>Rose Ferrer</u>
Period of Comment: <u>September 28, 2017</u> through <u>October 13, 2017</u>	Phone: <u>403-514-3886</u>
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Date [yyyy/mm/dd]: <u>2017/10/12</u>	

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.	Comment # 1: <u>Section 3(2):</u> “The requirements set out in subsections 3(1)(b)(v) and (vi) do not apply to a pool asset that provides regulating reserve from a generating unit that is equipped with an analog governor , as of December 23, 2014, until such time as the governor is replaced.” <u>Comment:</u> Pursuant to section 17(b) of the Electric Utilities Act, the AESO has a duty “to facilitate the operation of markets for electric energy in a manner that is fair and open and that gives all market participants wishing to participate in those markets and to exchange electric energy a reasonable opportunity to do so”. ENMAX believes the rules should apply equally to any governor technologies as long as they qualify with the technical requirements. In that light we suggest Section 3(2) be removed. Comment # 2: In Appendix 1 – Frequency Ranges, please qualify what both lines in the graph represent. Currently, only the blue line is noted.