

Market Participant Comment Matrix – September 28, 2017



Proposed Amended Section 205.6, *Supplemental Reserve Technical Requirements and Performance Standards* (“amended Section 205.6”)

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 205.6. 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 205.6? 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 6(1):</u> “A pool participant must, within ten (10) minutes following receipt of a directive to provide supplemental reserve , ensure that its pool asset is providing a quantity of real power equal to the instantaneous amount of real power of the pool asset at the time of the directive and the amount of real power set out in the directive .” <u>Comment:</u> This rule as written is unclear when considering facilities that provide multiple ancillary services simultaneously (i.e., Regulating reserve and Supplemental reserve). It would be helpful to rephrase this section to note that the Supplemental dispatch should be added to the Energy dispatch rather than to where ever the asset is based upon its current regulating setpoint. As such, we would suggest this rule be revised to read as follows: “A pool participant must, within ten (10) minutes following receipt of a directive to provide supplemental reserve, ensure that its pool asset is providing a quantity of real power equal to their current energy dispatch plus the amount of real power set out in the directive within the documented MW tolerances. Any regulating reserve services offered at the time of a directive would be provided in addition to the energy dispatch plus the stated directive.”

	<p><i>Comment # 2:</i></p> <p><u>Section 6(3)(a) and (b):</u></p> <p>“(3) A pool participant must ensure that, for each consecutive ten (10) minute interval beginning fifteen (15) minutes following the receipt of a directive, the average response from the pool asset equals the amount of real power set out in the directive within a tolerance of:</p> <p>(a) 5 MW for a pool asset with a maximum capability of 200 MW or less; or</p> <p>(b) 10 MW for a pool asset with a maximum capability of greater than 200 MW.”</p> <p><u>Comment:</u></p> <p>Where tolerance is listed as 5 MW and 10 MW, it is unclear whether these values are +/- 5 and 10 MW or +/- 2.5 and 5 MW. It would be helpful if the AESO could clarify this in the final rule.</p>
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