

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>Elemental Energy Inc.</u> Date [yyyy/mm/dd]: <u>2017/05/05</u>	Contact: <u>Dan Eaton</u> Phone: <u>604-648-6609</u> Email: <u>deaton@elementalenergy.ca</u>
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Listed below is the summary description of changes for the proposed new Section 304.9. 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
<p><b>New</b></p> <p>The AESO is seeking comments from market participants with regard to the following matters:</p> <ol style="list-style-type: none"> <li>Do you agree or disagree with the proposed new Section 304.9? If you disagree, please provide comments.</li> <li>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.</li> </ol>	<p>Question/Comment # 1:</p> <ul style="list-style-type: none"> <li><b><u>Data Collection Equipment and Availability Requirements</u></b></li> <li>(6) The gross real power capacity of the PV plant at any point is based on irradiance and unless there is a curtailment directive, there is no unused capacity. The AC nameplate capacity remains unchanged. Please clarify.</li> <li>(7) How frequently does this need to be done? (a) Unless there is a partial shut down of the PV plant for O&amp;M purposes, the entire nameplate capacity is available subject to irradiance.</li> </ul> <p>Question/Comment # 2:</p> <ul style="list-style-type: none"> <li><b><u>Pre-Commissioning Facility Data and Records Requirements</u></b></li> <li>8(2) It is <u>not typical</u> for pre-construction solar developers to measure the meteorology of a site preconstruction. Most solar projects are financed based on industry standard modelled solar data sources (ie. Meteonorm, Solar Anywhere, etc). It is reasonable to request the modelled data from the owner. We strongly recommend changing this requirement to</li> </ul>

	<p>something more industry standard.</p> <p><i>Question/Comment # 3:</i></p> <ul style="list-style-type: none"><li>• <b><u>Table 1 – Wind &amp; Solar Aggregated Generating Facility Meteorological Data Requirements</u></b></li><li>• The following data are <u>non-standard</u> for operating solar sites, are costly, and provide little value to owners or forecasters: Dewpoint, Relative Humidity, Precipitation, Diffused Horizontal Irradiance, Direct Normal Irradiance. These additional irradiance measurements are difficult to implement since certain parts of the instrument(s) may need to track the sun. Reliable operation is suspect when exposed to extreme weather. We strongly recommend removing this requirement, which burdens owners unnecessarily and adds little or no value to the AESO. The cost would be approximately \$50,000 +.</li></ul>
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