

Amendments to “acceptable operational reason” Definition

Date of Request for Comment: <u>April 16, 2018</u>	Contact: <u>David Michaud</u>
Period of Comment: <u>April 16, 2018</u> through <u>May 2, 2018</u>	Phone: <u>(403) 267-4913</u>
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Listed below is the summary description of changes for the proposed amended “acceptable operational reason” definition. Please place your comments/reasons for position underneath (if any).

Definitions – Amended			
Existing	Proposed	Current ISO Rules that contain definition	Market Participant Comments and/or Alternate Proposal
<p>“acceptable operational reason” means, any one (1) or more of the following:</p> <p>(i) a circumstance related to the operation of a generating source asset which if it operated could reasonably be expected to affect the safety of the source asset, the environment, personnel working at the source asset or the public;</p> <p>(ii) re-positioning a generating source asset assets, within the energy market due to the need to meet a dispatch given to that source asset from the ISO to serve the stand-by operating reserves market;</p> <p>(iii) re-positioning a generating source asset within the energy</p>	<p>“acceptable operational reason” means, any one (1) or more of the following:</p> <p>(i) a circumstance related to the operation of a generating source asset which if it operated could reasonably be expected to affect the safety of the source asset, the environment, personnel working at the source asset or the public;</p> <p>(ii) re-positioning a generating source asset assets, within the energy market due to the need to meet a dispatch given to that source asset from the ISO to serve the stand-by operating reserves market;</p> <p>(iii) re-positioning a generating source asset within the energy</p>	<p>Section 201.4, <i>Submission Methods and Coordination of Submissions</i>;</p> <p>Section 202.4, <i>Managing Long Lead Time Assets</i>;</p> <p>Section 203.1, <i>Offers and Bids for Energy</i>;</p> <p>Section 203.3, <i>Energy Restatements</i>;</p> <p>Section 203.6; <i>Available Transfer Capability and Transfer Path Management</i>; and</p> <p>Section 204.3, <i>Dispatch Down Service Restatements</i></p>	<p><i>Comment # 1: Since the background section of the Letter of Notice does not provide context for the amended definition, would the AESO please explain the reason for the amendment?</i></p> <p><i>Comment # 2: Since it is unclear whether an availability capability (“AC”) restatement using an acceptable operating reason (“AOR”) will be required following any distribution constraint or transmission outage, would the AESO please clarify whether an AC restatement would be required in all instances?</i></p> <p><i>Comment # 3: Regarding (vii) b), would the AESO confirm whether a source asset connected at the transmission level will be required to submit an AC restatement using an AOR when there is a transmission outage which results in that source asset being electrically disconnected from the transmission system. Such a clarification is required since it would be a change from the current process where:</i></p> <ul style="list-style-type: none"> <i>- the AESO automatically limits MW’s constrained down due to congestion which prevents the flow of in-merit electric energy, while AC remains unchanged.</i> <i>- It is our understanding that AESO Transmission Constraint Management (“TCM”) Transmission Constraint Rebalancing (“TCR”) calculations rely on AC representing the maximum MW assets are</i>

<p>market to manage physical or operational constraints associated with the source asset;</p> <p>(iv) re-positioning a pool asset that is an import asset or an export asset within the energy market to manage physical or operational constraints associated with an interconnection or a neighbouring balancing authority;</p> <p>(v) a circumstance directly resulting in the generating source asset not being capable of operation, which circumstance was solely caused by an occurrence of force majeure; or</p> <p>(vi) re-positioning a generating source asset for electric energy that is:</p> <p>a) produced on the property of which a person is the owner or a tenant; and</p> <p>b) consumed solely by that person and solely on that property.</p>	<p>market to manage physical or operational constraints associated with the source asset;</p> <p>(iv) re-positioning a pool asset that is an import asset or an export asset within the energy market to manage physical or operational constraints associated with an interconnection or a neighbouring balancing authority;</p> <p>(v) a circumstance directly resulting in the generating source asset not being capable of operation, which circumstance was solely caused by an occurrence of force majeure; or</p> <p>(vi) re-positioning a generating source asset for electric energy that is:</p> <p>a) produced on the property of which a person is the owner or a tenant; and</p> <p>b) consumed solely by that person and solely on that property-; or</p> <p>(vii) re-positioning a generating source asset within the energy market in response to:</p> <p>a) a distribution constraint that causes a limitation to the normal economic merit operation of the source asset, or to the flow of electrical energy from the source asset from one part of the electric distribution system to the other; or</p>		<p><i>physically capable of providing.</i></p> <ul style="list-style-type: none"> - <i>during outages or de-rates to transmission lines, certain TransAlta transmission connected assets receive notice from the AESO indicating we must not change an assets AC, as the constraint condition is not caused by a TransAlta asset.</i> <p><i>Alternate Proposal: If the amendment is being made to ensure availability of distribution generation connected assets can be accurately reflected in the event of a transmission outage or distribution outage affecting a distribution connected generator, then we propose the amendment should include language clearly specifying that (vii) only applies to distribution connected generation.</i></p> <p><i>If this proposal is adopted, we trust the AESO would ensure such assets connected at the distribution level would be subject to the same TCM related curtailment as other assets.</i></p> <p><i>Additional Proposal: TransAlta also requests the AESO revise part (ii) of the AOR definition to permit restatements for energy constrained storage assets. We propose the AESO should make the following revision to allow repositioning of a pool asset due to an operating reserve dispatch or directive.</i></p> <p>(ii) re-positioning a generating source asset assets, within the energy market due to the need to meet a dispatch or directive given to that source asset from the ISO to serve the stand-by operating reserves market;</p> <p><i>Comment #4: TransAlta would like to understand the potential impact the proposed revision may have regarding refund of Generating Unit Owner's Contributions, having consideration for performance criteria/availability assessment as described in the ISO Tariff and ISO Rules Section 505.2.</i></p>
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	b) a transmission outage that results in the source asset being electrically disconnected from the transmission system .		
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