Date of Request for Comment: April 7, 2017	**Contact:** Jennifer Tuck
Period of Comment: April 7, 2017 through May 5, 2017	**Phone:** 647-789-5656
Comments From: NextEra Energy Canada, LP	Email: Jennifer.tuck@nee.com
Date [yyyy/mm/dd]: 2017/05/05	

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
New The AESO is seeking comments from market participants with regard to the following matters: 1. Do you agree or disagree with the proposed new Section 304.9? 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:* NextEra believes that the proposed requirement for existing wind facilities to have a second meteorological tower to be excessive. This proposed change would negatively impact the economics of existing wind facilities without adding significant benefits to the AESO. Our existing facility in Alberta already has a single met tower currently in place, and the information provided by the addition of another meteorological tower would have minimal impact on data collection for the site. We recommend that the proposed Section 304.9 only apply to new wind facilities. Additionally, the requirement to have 98% of data availability at all times with only 48 hours to fix any issues could be challenging for operators to meet. We would propose lengthening the timeline to fix any issues that may occur to 72 hours. We also believe that the accuracy requirement of diffuse and direct irradiance would require an expensive set of instrumentation/sensors, which seems excessive. We propose the following instead: • Diffused Horizontal Irradiance accuracy: +/-5% (daily integrals) • Direct Normal Irradiance: Can be calculated from diffuse and GHI components

	We would also like clarification on sunshine duration: +/-10% with a lower threshold of 120 W/m2 in the direct beam. Furthermore, we recommend changing accuracy of the back of module temperature to +/- 0.15°C (-27°C to +50°C). That spec would meet class A RTD specifications.