

Proposed Amended Section 502.1, Aggregated Generating Facilities Technical Requirements ("amended Section 502.1")

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
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Listed below is the summary description of changes for the proposed amended Section 502.1. 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

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 502.1? 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 is generally supportive of the proposed Section 502.1, but the dynamic reactive requirement of 0.9 supplying at the collector bus is excessive compared to the AESO's current reactive requirements and the FERC Order 827. We believe that reasonable language would be "dynamic reactive of 0.95 supplying to 0.95 absorbing measured at the collector bus."

Should the AESO insist on a more excessive requirement, we would like the AESO to provide further justification on why this is needed, including evidence that the load serving entities also comply with their power factor obligations and that reactive support of the distribution system is optimized as a result.