

## Market Participant Comment Matrix – September 28, 2017



### Proposed Amended Section 205.4, *Regulating Reserve Technical Requirements and Performance Standards* (“amended Section 205.4”)

Date of Request for Comment: <u>September 28, 2017</u>	<b>Contact:</b> <u>Mark Thompson</u>
Period of Comment: <u>September 28, 2017</u> through <u>October 13, 2017</u>	<b>Phone:</b> <u>403-920-5005</u>
Comments From: <u>TransCanada Energy Ltd. (TCE)</u>	<b>Email:</b> <u>markj_thompson@transcanada.com</u>
Date [yyyy/mm/dd]: <u>2017/10/13</u>	

Listed below is the summary description of changes for the proposed amended Section 205.4. 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
<b>Amended</b> 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 205.4? 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.	<b>Comment # 1:</b>  <i>In its September 28, 2017 Letter of Notice, the AESO stated that “the frequency response requirements for regulating reserve and spinning reserve have been amended to ensure immediate governor response without unintentional delay. Under amended Section 205.4 and amended 205.5, regulating reserve resources and spinning reserve resources must be capable of providing an “immediate, automatic and sustained response to frequency deviations”, respectively. In addition, dispatch performance requirements require the pool participant to ensure that, while under dispatch to provide either spinning reserve or regulating reserve, the change in real power of the spinning reserve resource or regulating reserve resource is “continuously proportional to the measured frequency” and is sustained when the frequency goes outside the deadband of equal to or less than 0.036 Hz.”</i>  <i>The Letter of Notice also stated that “[e]xisting providers of operating reserve will not be impacted by the amendments described above as their pool assets continue to meet the eligibility and performance requirements, and remain qualified to provide operating reserve.”</i>  <i>After reviewing the proposed changes TCE is not aware of any provisions that grandfather existing providers of operating reserves. Has the AESO reviewed the capabilities of the existing providers to confirm that each facility will not be impacted? If not, please provide the necessary assurances within the proposed rule that is consistent with the AESO’s statement that these facilities will remain qualified.</i>