

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>Turning Point Generation</u> Date [yyyy/mm/dd]: <u>2017/05/17</u>	Contact: <u>Peter Bubik</u> Phone: <u>403-703-1676</u> Email: <u>peterbubik@turningpointgeneration.ca</u>
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Listed below is the summary description of changes for the proposed amended Section 202.6. 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 202.6? 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.	<p><i>Comment # 1: The rule is not ready for grid connected energy storage. It should distinguish between price responsive load and energy storage. A grid connected energy storage facility can provide real time system support far beyond the capability of price responsive load.</i></p> <p><i>For example, a wind or solar aggregated generation facility should be allowed to contract with a grid connected energy storage facility for providing ramp rate limiting service (this will be further discussed in other rules). The language in Rule 202.6 should be modified to allow for such arrangements and these should be reflected in the Adequacy of Supply calculations. Windfarms that have a contract with a grid connected energy storage facility to provide dispatchable power or that have behind the fence energy storage do not need to be excluded from Long Term Adequacy Metrics 4 (2) (b) (v)</i></p>