

Operating Reserves, Version 12

Response to Customer Comments

Posted: Oct. 20, 2016

This document contains the Transmission Customer comments and Transmission Services' response to those comments for Operating Reserves, Version 12, posted for review from Sept. 17, 2016 - Oct. 6, 2016.

Table of Contents

| | |
|--------------------|---|
| 1. Invenergy | 1 |
|--------------------|---|

1. Invenergy

Invenergy respectfully opposes the change in A.9.b prohibiting a wind generator from requesting reserves twice within two hours because it does not allow for a situation wherein turbines experience high enough wind speed to shut down twice within a two hour time period. It is impossible to say this situation will not occur. Invenergy respectfully requests deletion of the last sentence beginning "Wind generators requesting reserves.." because it would deny rights to wind generators that are afforded to other generators, it arbitrarily sets a two hour limit, and it does not allow for situations that might realize and are beyond the generator's control.

Transmission Services' Response:

TS appreciates Invenergy's perspective. However, TS does not agree that that this would deny rights to wind generators afforded to other generators. The purpose of the two hour limit in section A.9.b is to treat wind generators the same as other types of generators by clarifying what the treatment is for a hi-speed cut-out event.

As noted in that section, reserves cannot be requested again by any generator for the same qualifying event. In the case of a major wind event, it is reasonable to consider it the same event for two hours based on the judgement of TS. The goal of the business practice change is to make sure that wind generators receive reserves at the start of the event instead of continuing to receive reserves for multiple hours for the same event.