



February 9, 2011

Independent Electricity System Operator  
Attention: Darren Finkbeiner  
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Dear Mr. Finkbeiner:

**RE: Integrating Renewable Resources – Design Principles**

TransCanada Energy Ltd. (“TCE”) would like to thank the Independent Electricity System Operator (“IESO”) for the opportunity to comment on the Design Principles for Integrating Renewable Resources.

First, TCE is in support of Principle 6. Forecasts of renewable energy production should be publically available in a format that will allow all market participants to anticipate energy production from these resources. Access to these renewable generation forecasts are necessary for system reliability as they are an integral part of the information required to allow generators to better plan their operations ensuring they will be available to produce energy or be prepared to ramp off when market conditions require.

Second, TCE supports a coordinated approach between outage planning and the forecasting of surplus baseload generation (“SBG”). It is TCE’s view that variable generation should be motivated to arrange and take maintenance outages during times of SBG in order to mitigate excess supply.

Third, Operating Reserve (“OR”) requirements as well as Automatic Generation Control (“AGC”) are essential to maintaining the reliability of Ontario’s electricity system. With the considerable amount of wind generation coming into service it is important to revisit both of these requirements as the intermittent nature of these generators will impact both the balance and the operations of the electricity system.

Best Regards,

**TRANSCANADA ENERGY LTD.**

Margaret Kuntz