

Date of Request for Comment:	<u>November 20, 2018</u>
Period of Comment:	<u>November 20, 2018</u> through <u>December 5, 2018</u>

Blackline of Suggested Rule Wording	Rationale	AESO Replies
<p>Suncor Energy Inc. (“Suncor”)</p> <p>5 (b) in the case of contract load shed service for imports, within the time frame set out in the contract; or</p>	<p>The AESO has not provided the issue this amendment is intended to address, the purpose for this amendment, or any data/analyses to support the amendment as required by Alberta Utilities Commission Rule 017: <i>Procedures and Process for Development of ISO Rules and Filing of ISO Rules</i> (“AUC Rule 017”). Accordingly, Suncor is unable to assess whether subsection 5(b) should be maintained, amended, or deleted. Suncor opposes any change to this section until it can be evaluated using the information the AESO is required to provide under AUC Rule 017.</p>	<p>The AESO identified both the overarching issue this amendment is intended to address, and the purpose for this amendment in its letter of notice.</p> <p>The AESO is only required to provide any data or analyses that it actually has and which it considers to be “relevant to the need for, development of, removal of, or renewal of the proposed rule”. The AESO is not required to find data or conduct analyses to support the amendment. The AESO does not have any data or analyses to provide in relation to this amendment.</p> <p>Subsection 5(b) required pool participants to acknowledge the receipt of a dispatch for load shed service for imports within the time frame specified in the contract. The reason for removing subsection 5(b) is that the language in the contract handles non-compliance events and communication requirements are addressed in Section 502.8 of the ISO rules, <i>SCADA Technical and Operating Requirements</i>.</p>

Please provide your comments on the following (as set out in AUC Rule 017 s. 7.2(b-j)):

Item #		Stakeholder comments	AESO Replies
1	whether you are of the view that proposed amended Section 201.7 of the ISO rules, <i>Dispatches</i> relates to the capacity market and why or why not		
2	if the answer to item #1 is yes, whether you agree that proposed amended Section 201.7 of the ISO rules, <i>Dispatches</i> should or should not be in effect for a fixed term and why or why not		
3	whether you understand and agree with the objective or purpose of proposed amended Section 201.7 of the ISO rules, <i>Dispatches</i> and whether, in your view, proposed amended Section 201.7 of the ISO rules, <i>Dispatches</i> meets the objective or purpose	<p><u>Suncor Energy Inc. (“Suncor”)</u></p> <p>The AESO has not provided either the objective or the purpose for its proposed amendments to this rule. Accordingly, the appropriateness or effectiveness of the proposed amendments cannot be evaluated.</p>	<p>See the AESO’s response to Suncor’s comment above for purpose of the amendments to Section 201.7 of the ISO rules, <i>Dispatches</i>.</p>
4	how, in your view, proposed amended Section 201.7 of the ISO rules, <i>Dispatches</i> affects the performance of the capacity market and the electricity market		
5	your views on any analysis conducted or commissioned by the AESO supporting proposed amended Section 201.7 of the ISO rules, <i>Dispatches</i>		
6	whether you agree with proposed amended Section 201.7 of the ISO rules, <i>Dispatches</i> taken together with all ISO rules and in light of the principle of a fair, efficient and openly competitive market		

Item #		Stakeholder comments	AESO Replies
7	whether you would suggest any alternatives to proposed amended Section 201.7 of the ISO rules, <i>Dispatches</i>		
8	if the answer to item #1 is yes, whether you agree that proposed amended Section 201.7 of the ISO rules, <i>Dispatches</i> supports ensuring a reliable supply of electricity at a reasonable cost to customers and why or why not		
9	whether you agree that proposed amended Section 201.7 of the ISO rules, <i>Dispatches</i> supports the public interest and why or why not		
10	whether you have any additional comments		