

Proposed Amended Section 202.6 of the ISO rules, *Adequacy of Supply*

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>2 (b) on-site generation that supplies behind-the-fence load and submits available capability as a net-to-grid value;</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.</p> <p>Without the benefit of the information requirements listed immediately above, it appears to Suncor that the proposed addition of section 2(b) will lead to double counting available generation in the AESO’s adequacy assessment. It appears that the available capability from behind-the-fence generation is already included in section 2(a). Adding section 2(b) would lead to double-counting this generation.</p> <p>Suncor would be in a better position to comment on the proposed changes if the AESO had provided any indication of the issue it perceived with the current rule and if the AESO had provided an objective or purpose for the proposed change.</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>The addition of subsection 2(b) is intended to capture assets that offer their available capability net-to-grid, i.e. the pool asset’s available capability does not include on-site generation that supplies behind-the-fence load.</p> <p>The AESO does not agree that the addition of subsection 2(b) will lead to double counting available generation in the AESO’s adequacy assessment</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 202.6 of the ISO rules, <i>Adequacy of Supply</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 202.6 of the ISO rules, <i>Adequacy of Supply</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 202.6 of the ISO rules, <i>Adequacy of Supply</i> and whether, in your view, proposed amended Section 202.6 of the ISO rules, <i>Adequacy of Supply</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 202.6 of the ISO rules, <i>Adequacy of Supply</i>.</p>
4	how, in your view, proposed amended Section 202.6 of the ISO rules, <i>Adequacy of Supply</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 202.6 of the ISO rules, <i>Adequacy of Supply</i>		
6	whether you agree with proposed amended Section 202.6 of the ISO rules, <i>Adequacy of Supply</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 202.6 of the ISO rules, <i>Adequacy of Supply</i>		
8	if the answer to item #1 is yes, whether you agree that proposed amended Section 202.6 of the ISO rules, <i>Adequacy of Supply</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 202.6 of the ISO rules, <i>Adequacy of Supply</i> supports the public interest and why or why not		
10	whether you have any additional comments		