

Proposed Amended Section 304.2 of the ISO rules, *Electric Motor Start Requirements*

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>All proposed changes should be rejected.</p>	<p>The AESO has not provided the issue these amendments are intended to address, the purpose for these amendments, or any data/analyses to support these amendments 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 Rule 304.6 should be maintained, amended, or deleted. Suncor opposes any change to this Rule 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. Specifically, the amendments are intended to remove requirements that are no longer needed and make administrative amendments as identified in items (e) and (f) of the letter of notice, respectively.</p> <p>The AESO is in the process of determining whether any relevant data, analysis, or other material has been conducted or created. If it has been, the AESO will determine next steps which may include re-consulting on the proposed amendments in January and including any relevant supporting documents.</p> <p>In addition, the AESO is moving specific conditions for approval to an Information Document, as these conditions are based on current operational needs in an area. The AESO requires flexibility to update these conditions in order to operate the system reliably.</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 304.2 of the ISO rules, <i>Electric Motor Start Requirements</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 304.2 of the ISO rules, <i>Electric Motor Start Requirements</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 304.2 of the ISO rules, <i>Electric Motor Start Requirements</i> and whether, in your view, proposed amended Section 304.2 of the ISO rules, <i>Electric Motor Start Requirements</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 304.2 of the ISO rules, <i>Electric Motor Start Requirements</i>.</p>
4	how, in your view, proposed amended Section 304.2 of the ISO rules, <i>Electric Motor Start Requirements</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 304.2 of the ISO rules, <i>Electric Motor Start Requirements</i>		
6	whether you agree with proposed amended Section 304.2 of the ISO rules, <i>Electric Motor Start Requirements</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 304.2 of the ISO rules, <i>Electric Motor Start Requirements</i>		
8	if the answer to item #1 is yes, whether you agree that proposed amended Section 304.2 of the ISO rules, <i>Electric Motor Start Requirements</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 304.2 of the ISO rules, <i>Electric Motor Start Requirements</i> supports the public interest and why or why not		
10	whether you have any additional comments		