

Proposed Amended Section 304.8 of the ISO rules, *Event Analysis*

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>1(i)(ii) has a maximum authorized real power rating greater than 4.5 MW; and</p>	<p>The AESO has not provided the issue caused by Rule 304.8 applying to units with a maximum authorized real power rating less than or equal to 4.5 MW, the objective or purpose of the 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”).</p> <p>Accordingly, Suncor is unable to assess this amendment. 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 AESO considers this to be an administrative amendment as identified in item (f) of the letter of notice as this amendment to subsection 1(i)(ii) is intended to align the maximum authorized real power MW threshold with subsections 1(d) and 1(e) of Section 304.8 of the ISO rules, <i>Event Analysis</i>.</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>1(i)(i) has a maximum authorized real power rating greater than 4.5 MW</p>	<p>See immediately above.</p>	<p>See the AESO’s response to Suncor’s comment on subsection 1(i)(ii) above.</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 304.8 of the ISO rules, <i>Event Analysis</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 304.8 of the ISO rules, <i>Event Analysis</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 304.8 of the ISO rules, <i>Event Analysis</i> and whether, in your view, proposed amended Section 304.8 of the ISO rules, <i>Event Analysis</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 304.8 of the ISO rules, <i>Event Analysis</i>.</p>
4	how, in your view, proposed amended Section 304.8 of the ISO rules, <i>Event Analysis</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 304.8 of the ISO rules, <i>Event Analysis</i>		
6	whether you agree with proposed amended Section 304.8 of the ISO rules, <i>Event Analysis</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 304.8 of the ISO rules, <i>Event Analysis</i>		
8	if the answer to item #1 is yes, whether you agree that proposed amended Section 304.8 of the ISO rules, <i>Event Analysis</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 304.8 of the ISO rules, <i>Event Analysis</i> supports the public interest and why or why not		
10	whether you have any additional comments		