

Stakeholder Comment Matrix – January 5, 2021

Development of Proposed Amendments to Section 202.6 of the ISO rules, *Adequacy of Supply* (“Section 202.6”)



<p>Period of Comment: January 5, 2021 through January 22, 2021</p> <p>Comments From: Suncor Energy Inc.</p> <p>Date: 2021/01/21</p>	<p>Contact: Alexandra Dunlop</p> <p>Phone: 403-540-0250</p> <p>Email: aadunlop@suncor.com</p>
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Instructions:

1. Please fill out the section above as indicated.
2. Please refer back to the Letter of Notice under the “Related Materials” section to view related materials.
3. Please respond to the questions below and provide your specific comments (if any). Blank boxes will be interpreted as favourable comments.

The AESO is seeking comments from Stakeholders on the development of proposed amendments to Section 202.6 of the ISO rules, Adequacy of Supply, with regard to the following matters:

Development of a Proposed ISO Rule		Stakeholder Comments and/or Alternate Proposal
1.	Do you agree or disagree that the issue identified requires the development of proposed amendments to Section 202.6? Please comment.	Suncor disagrees with the issue identified. The objective is stated to be red tape reduction but results in a decrease of market transparency. The detailed calculations in place for assessing supply adequacy help market participants to understand market conditions, and make decisions for their generation and load accordingly. Forecasting supply adequacy with no metrics will make it unclear for participants.



Development of a Proposed ISO Rule		Stakeholder Comments and/or Alternate Proposal
2.	Do you agree or disagree with the potential objective or purpose of proposed amendments to Section 202.6? Please comment.	<p>Suncor disagrees with the objective, as having detailed requirements for supply adequacy forecasts is essential to market transparency.</p> <p>Supply Adequacy Forecast: The AESO’s proposed amendments remove all detail of what goes into the adequacy forecast. Although the AESO has stated that to date they have not used the information when deciding on outage cancellations, they may do so in the future. It is insufficient to state that the AESO would expect to report on the situation to a level of detail that meets or exceeds the information provided in the daily supply adequacy reports in the rare event that a generation outage must be cancelled because of a supply adequacy shortfall. Further, market participants still rely on this information when making decisions for their own units.</p> <p>Short Term Adequacy Assessments: The AESO is proposing to remove the requirement of short-term adequacy assessments but still intends to continue publicly posting the report. While the AESO claims this assessment provides no value, market participants do see value in this report. However, without the details of how the AESO is determining their supply adequacy metric it will be very difficult for market participants to make decisions around the supply adequacy number the AESO is posting.</p> <p>Long Term Adequacy Metrics and Reporting: The AESO is proposing to remove all details of the Long Term Adequacy Reports. Market participants rely on this information when making decisions to bring generation and loads on or offline. As much market transparency as possible is required and this is moving in the wrong direction.</p>



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3.	Do you agree or disagree with the proposed form of consultation and timelines? Please comment.	Suncor would like to see some discussion with market participants included in the consultations besides just the comment matrix so that the AESO is able to better understand the impact of these changes on market participants. For example, during the capacity market consultation, supply-cushion was determined to be a relevant real-time metric and market participants requested a supply-cushion report to be created. Suncor submits that instead of simply eliminating detail on reporting, it would be beneficial to instead consult with industry to create useful reports with as much detail available to industry as possible so that market participants can make informed decisions.
4.	Do you have any additional comments?	It is important to understand the purpose of red tape reduction. The goal is to simplify life for Albertans by eliminating administrative overhead and barriers. The AESO reducing available information is counterproductive as market participants will have to spend individual effort to recreate information that was formerly centrally available. Further, removing details from the rule while maintaining the reports, as suggested by the AESO, serves no purpose and only introduces uncertainty.