

**Stakeholder Comment Matrix – August 8, 2019**  
**Development of Proposed Amended Section 305.1 of the ISO rules, Energy**  
**Emergency Alerts (‘Section 305.1’)**



<b>Period of Comment:</b> August 8, 2019 through August 23, 2019 <b>Comments From:</b> Suncor Energy Inc. <b>Date:</b> 2019/08/23	<b>Contact:</b> Horst Klinkenberg <b>Phone:</b> (403) 296 4938 <b>Email:</b> hklinkenberg@suncor.com
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*The AESO is seeking comments from Stakeholders on the development of proposed amended Section 305.1 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 amended Section 305.1? Please comment.	<i>Suncor agrees that the identified issue requires consultation regarding potential changes to Section 305.1.</i>
2.	Do you agree or disagree with the potential objective or purpose of proposed amended Section 305.1? Please comment.	<i>Suncor agree with the objective to avoid duplication between ISO rules and NERC standards. Suncor submits that in addition, whenever an ISO rule is opened for consultation, an additional objective should be to see if further improvements to the rule can be made.</i>
3.	Do you agree or disagree with the proposed form of consultation and timelines? Please comment.	<i>Suncor does not disagree with the initial proposal; requests however adequate consideration of any proposed rule changes.</i>
4.	Do you intend to participate in any related written consultation?	<i>Yes, Suncor intends to fully participate in the consultation.</i>
5.	Do you have any additional comments?	<p><i>Suncor submits that the consultation on Section 305.1 should be combined with the consultation on OPP 804 and all related proposed new or retirements of Alberta rules, OPPs or reliability standards.</i></p> <p><i>Suncor is concerned that the proposed amendments to Section 305.1 reduce the information available to market participants. During the capacity market consultation, it was identified that supply cushion and EEA conditions are an important reliability metric. Prices and price forecast have historically often been poor indicators of</i></p>

		<p><i>scarcity. Suncor therefore requests amending Section 305.1 to include as much granularity in reporting as possible to inform participants about actual scarcity conditions. Additionally, Suncor requests to add the real time supply cushion and a supply cushion forecast to its market reports. The former should be coupled with the System Marginal Price report and the latter with the Actual / Forecast report.</i></p>
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