



<p>Period of Comment: October 26, 2020 through November 9, 2020</p> <p>Comments From: Cenovus Energy Inc</p> <p>Date [yyyy/mm/dd]: 2020/11/09</p>	<p>Contact: Grant Pellegrin</p> <p>Phone: 403-766-3955</p> <p>Email: Grant.pellegrin@cenovus.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 for Feedback on the Content of Proposed Options for Amended Section 505.2* under the “Related Materials” section to view the actual draft proposed materials on amended Section 505.2.
3. On the sections of the rule listed below, please provide your specific comments, proposed revisions, and reasons for your position underneath (if any). Blank boxes will be interpreted as favourable comments.
4. Please be advised that general comments do not give the AESO any specific issue to consider and address, and results in a general response.

Question	Stakeholder Comments
<p>Refund of Generating Unit Owner’s Contribution</p> <p>2 The ISO must calculate a refund for each calendar year during the refund period as follows:</p> <p>refund = (annual amount x availability) x (1 – penalty factor)</p> <p>where:</p> <p>(a) annual amount is as specified in the ISO tariff;</p>	<p>No Comments</p>

Question	Stakeholder Comments
<p>(b) availability is the availability factor assessed for the calendar year in accordance with subsection 3(1); and</p> <p>(c) penalty factor is the penalty factor calculated for the calendar year in accordance with subsection 3(2).</p>	
<p>Performance Assessment</p>	
<p>3(1) The ISO must assess the availability of a generating unit or aggregated generating facility as follows:</p> <p>(a) if the revenue meter of the generating unit or aggregated generating facility recorded metered energy in a settlement interval during the previous calendar year, availability factor is 100%;</p> <p>(b) if the revenue meter of the generating unit or aggregated generating facility recorded zero metered energy in all settlement intervals during the previous calendar year, availability factor is 0%.</p>	<p>CVE generally supports this proposed methodology; all generation types appear to have the same criteria to earn their refund which is beneficial in comparison to Option 1</p> <p>CVE is uncertain what would happen to a BTF site with on-site load, there are situations where the on-site load grows over the refund time period and may ultimately exceed generation. What happens to the calculation in the case where there is no longer generation being recorded at the revenue meter, potentially despite the generator running at full capability the entire year.</p>
<p>(2) If the maximum capability of the generating unit or aggregated generating facility on the first day of each calendar year during the refund period is less than its critical maximum capability, the ISO must assess a penalty factor as follows:</p> $\text{penalty factor} = \frac{\text{ABS}(\text{critical maximum capability} - \text{energized maximum capability})}{\text{critical maximum capability}}$ <p>where:</p>	<p>No Comments</p>

Question	Stakeholder Comments
<p>(a) critical maximum capability is</p> <ul style="list-style-type: none"> (i) the maximum capability of the generating unit or aggregated generating facility at the time the Rate STS system access service agreement is effective; or (ii) energized maximum capability as defined in subsection 3(2)(b), if there is no change in Rate STS at the point of supply; <p>and</p> <p>(b) energized maximum capability is the maximum capability of the generating unit or aggregated generating facility following energization and commissioning.</p>	
<p>Preliminary Refund Assessment</p>	
<p>4 The ISO must provide a preliminary refund assessment, along with relevant input data, to the legal owner of a generating unit or an aggregated generating facility by January 31 of the year following the calendar year to which the refund relates.</p>	<p>This appears acceptable</p>