



<p><b>Period of Comment:</b> October 26, 2020 through November 9, 2020</p> <p><b>Comments From:</b> Suncor Energy Marketing Inc.</p> <p><b>Date [yyyy/mm/dd]:</b> 2020/11/09</p>	<p><b>Contact:</b> Horst Klinkenberg</p> <p><b>Phone:</b> (403) 819-7125</p> <p><b>Email:</b> hklinkenberg@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 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><b>Refund of Generating Unit Owner’s Contribution</b></p> <p><b>2</b> 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>This section seems overly cumbersome.</p> <p>Section 3(1) should be directly incorporated given that the effect of recording zero in all hours is that the refund no longer requires calculation but simply becomes zero.</p> <p>Given the definition of the penalty factor, and assuming that the absolute value function (ABS) in 3(2) actually is superfluous, the “one minus” part should be moved into 3(2) [where it would disappear]. The “penalty factor” should in this case probably be named differently.</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><b>Performance Assessment</b></p>	
<p><b>3(1)</b> The <b>ISO</b> must assess the availability of a <b>generating unit</b> or <b>aggregated generating facility</b> as follows:</p> <p>(a) if the <b>revenue meter</b> of the <b>generating unit</b> or <b>aggregated generating facility</b> recorded metered energy in a <b>settlement interval</b> during the previous calendar year, availability factor is 100%;</p> <p>(b) if the <b>revenue meter</b> of the <b>generating unit</b> or <b>aggregated generating facility</b> recorded zero metered energy in all <b>settlement intervals</b> during the previous calendar year, availability factor is 0%.</p>	<p>This section is unnecessarily long by explicitly spelling out both sides of a total; either (a) or (b) can be written as “otherwise”. Given the binary nature of the availability factor, this entire section can be easily folded into section 2.</p>
<p><b>(2)</b> If the <b>maximum capability</b> of the <b>generating unit</b> or <b>aggregated generating facility</b> on the first day of each calendar year during the refund period is less than its critical <b>maximum capability</b>, the <b>ISO</b> 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>This section does not cover the total range of outcomes. When the “<b>maximum capability</b> of the <b>generating unit</b> or <b>aggregated generating facility</b> on the first day of each calendar year during the refund period is <u>greater or equal</u> than its critical <b>maximum capability</b>,” the penalty factor is undefined.</p> <p>There is some confusion around the three terms:</p> <ul style="list-style-type: none"> <li>• maximum capability,</li> <li>• energized maximum capability and</li> </ul>

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<p>(a) critical maximum capability is</p> <ul style="list-style-type: none"> <li>(i) the <b>maximum capability</b> of the <b>generating unit</b> or <b>aggregated generating facility</b> at the time the Rate STS system access service agreement is effective; or</li> <li>(ii) energized <b>maximum capability</b> as defined in subsection 3(2)(b), if there is no change in Rate STS at the point of supply;</li> </ul> <p>and</p> <p>(b) energized <b>maximum capability</b> is the <b>maximum capability</b> of the <b>generating unit</b> or <b>aggregated generating facility</b> following energization and <b>commissioning</b>.</p>	<ul style="list-style-type: none"> <li>• critical maximum capability.</li> </ul> <p>Are all three terms required? Suncor requires more clarity in order to fully understand and evaluate this section.</p> <p>Suncor believes that instead of a calculation based on only the first day of the calendar year, the calculation should incorporate the average of the appropriate maximum capability value.</p> <p>The absolute value function (ABS) seems superfluous given the condition stated for the calculation. This would allow for a significant simplification of the formula. The simplified formula would be easier to understand and clearly show the logic behind the refund calculation.</p>
<p><b>Preliminary Refund Assessment</b></p>	
<p><b>4</b> The <b>ISO</b> must provide a preliminary refund assessment, along with relevant input data, to the <b>legal owner</b> of a <b>generating unit</b> or an <b>aggregated generating facility</b> by January 31 of the year following the calendar year to which the refund relates.</p>	