

Stakeholder Comment Matrix

Development of Proposed Amended ISO Rules and AESO Consolidated Authoritative Documents Glossary Definitions, collectively referred to as the “TCM Updates”



Period of Comment: February 6, 2020 through February 21, 2020	Contact: Horst Klinkenberg
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Instructions:

1. Please fill out the section above as indicated.
2. Please refer back to the Consultation Letter under the “Attachments” section to view materials related to the proposed TCM Updates.
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 the proposed TCM Updates with regard to the following matters:

Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
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	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 TCM Updates? Please comment.	<p>Suncor submits that the issues stated by the AESO do not justify the proposed TCM updates. In fact, most of the proposed updates are unrelated to these issues, which results in the notice not meeting the requirements of section 4.3 of AUC Rule 017.</p> <ul style="list-style-type: none"> • The proposed changes to ISO Rule 202.6 are unrelated to the issues stated by the AESO. • The only substantive proposed changes to ISO Rule 202.7 (removal of 3(2)(c) and 9(2)(c)) are unrelated to the issues stated by the AESO. • The proposed language changes in ISO Rule 302.1 do not relate to the “circumstances under which the AESO follows the procedures prescribed by the ISO rule.” • The proposed addition of subsection (vii) to the definition of an “acceptable operational reason” (AOR) does not “provide clarity” but instead creates an entirely new and novel interpretation of circumstances that would require an AOR. <p>In order to provide meaningful comments on the proposed rule changes, it is necessary to understand the issues the AESO is trying to address. Absent this information, Suncor opposes the rule changes, particularly the removal of section 3(2)(c) and 9(2)(c) from ISO Rule 202.7 and the addition of subsection (vii) from the AOR definition. On their face these are harmful changes that would need offsetting benefits in order to potentially make them justifiable.</p>

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2.	Do you agree or disagree with the potential objective or purpose of proposed TCM Updates? Please comment.	<p>While Suncor does not oppose the objectives per se, the objectives do not seem to align with the AESO’s perceived issues; further, the proposed substantive changes to the rules are unrelated to the objectives.</p> <p>As an example of the former, the proposed changes to ISO Rules 202.6 and 302.1 seem to align with objectives (a) and (d) but, as stated in response to question 1 above, have no discernable relationship to the AESO’s perceived issues.</p> <p>As an example of the latter, the proposed removal of sections 3(2)(c) and 9(2)(c) from ISO Rule 202.7 and the proposed addition of section (vii) to the AOR definition relate to none of the objectives or AESO perceived issues.</p>
3.	Do you agree or disagree with the proposed form of consultation and timelines? Please comment.	Suncor disagrees both with the form of the consultation and the associated timelines. This is the third time that the AESO proposed essentially the same changes to these rules and definitions. On each occasion, the AESO has not adequately stated the issues and objectives the proposed changes are intended to address, as required by AUC Rule 017. This has been raised by stakeholders each time the AESO proposed these changes. As a first step before contemplating the process or timelines, the AESO is required to provide adequate notice in accordance with AUC Rule 017 and in particular with subsections 4.3(a) and (b) of that rule.
4.	Do you intend to participate in any related consultation? OR Do you agree that no consultation group is required for this rule development? Please comment.	Suncor intends to fully participate in consultation regarding the proposed rule changes after it is properly initiated. Once the AESO has clearly provided the issues and objectives it intends to address, Suncor can provide further details on necessary consultation steps, appropriate timelines, and Suncor’s anticipated involvement.
5.	Do you have any additional comments?	It would be helpful if all previous material and stakeholder comments would be posted on the AESO’s website and in particular all stakeholder submissions from December 2018 and December 2019.