

<p><b>Period of Comment:</b> December 3, 2020 through January 8, 2021</p> <p><b>Comments From:</b> Suncor Energy Marketing Inc.</p> <p><b>Date [yyyy/mm/dd]:</b> 2021/01/08</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 of Proposed Final Draft of Amended Section 505.2*, under the “Related Materials” section, to view the final 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
<b>Performance Assessment</b>	
<p><b>2(1)</b> The ISO must assess the performance of a <b>generating unit</b> or <b>aggregated generating facility</b> as follows:</p> <p>(a) subject to subsection 2(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, the performance factor is 0%;</p>	<p>Suncor submits that the section “and offers excess generation to the energy market on a net basis” should be deleted from subsection 2(1)(b). Whether the generating facilities offer on a gross or net basis should have no bearing on the determination of the performance factor.</p> <p>Suncor accepts that for a site that consistently imports, it wouldn’t matter whether the generating facilities offer on a gross or net basis. However, the situation could arise where in some years on-site load exceeds on-site generation capability in all hours and in some years the site exports power to</p>

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<p>(b) for a site with 1 or more onsite <b>generating units</b> or <b>aggregated generating facilities</b> that supply electric energy for 1 or more onsite load assets <del>and offers excess generation to the energy market on a net basis</del>, if the <b>revenue meter</b> recorded zero metered energy in all <b>settlement intervals</b> because load growth at the site resulted in no export to the <b>interconnected electric system</b>, the performance factor is 100%; and</p> <p>(c) in all other cases, the performance factor is 100%.</p>	<p>the grid. It would be inappropriate to mandate a net offer for the generating facilities to be eligible for the determination of the performance factor under section 2(1)(b).</p>
<p><b>(2)</b> The <b>ISO</b> must assess a performance adjustment factor for a <b>generating unit</b> or <b>aggregated generating facility</b> in accordance with the following formula if, based on the <b>ISO</b>'s most recent information at the time of the performance assessment, energized MC is not equivalent to critical MC:</p> $\text{performance adjustment factor} = \frac{\text{ABS}(\text{critical MC} - \text{energized MC})}{\text{critical MC}}$ <p>where:</p> <p>(a) ABS is absolute value;</p> <p>(b) critical MC is, subject to subsection 2(3), the <b>maximum capability</b> of the <b>generating unit</b> or <b>aggregated generating facility</b> used to calculate the contribution of the <b>legal owner</b> of a <b>generating unit</b>; and</p> <p>(c) energized MC is, subject to subsection 2(3), the <b>maximum capability</b> of the <b>generating unit</b> or <b>aggregated generating facility</b> that the <b>legal owner</b> submits to the <b>ISO</b> in accordance with the applicable <b>pool asset</b> registration process.</p>	<p>Suncor submits that some further clarity regarding the definition of <i>critical MC</i> [subsection 2(2)(b)] and the ability to change it [subsection 2(3)] is required. Subsection 2(3) implies that the market participant can easily change the <i>critical MC</i> while subsection 2(2)(b) implies that the <i>critical MC</i> is a fixed number that is determined at a specific point in time (when the GUOC is determined). At this point Suncor is not confident it understands what <i>critical MC</i> is and when and how it could be changed.</p>

Question	Stakeholder Comments
<p><b>(3)</b> The <b>ISO</b> must, if the <b>legal owner</b> of the <b>generating unit</b> or <b>aggregated generating facility</b> updates the critical MC or energized MC of the <b>generating unit</b> or <b>aggregated generating facility</b> with the <b>ISO</b> on or before October 30 of the year before the refund calculation, adjust critical MC or energized MC in the application of the formula in subsection 2(2) based on the information the <b>legal owner</b> provides.</p>	<p>Please see the previous comments regarding subsection 2(2). Suncor is unclear on why October 30 was selected as a cut-off date compared to a later date in the year.</p>
<p><b>Refund of Generating Unit Owner's Contribution</b></p>	
<p><b>3</b> The <b>ISO</b> must calculate a refund for each calendar year during the refund period as follows:</p> $\text{refund} = (\text{annual amount} \times \text{performance factor}) \times (1 - \text{adjustment factor})$ <p>where:</p> <ul style="list-style-type: none"> <li>(a) annual amount is as specified in the <b>ISO tariff</b>;</li> <li>(b) performance factor is the performance factor assessed in accordance with subsection 2(1) for the calendar year; and</li> <li>(c) adjustment factor is the performance adjustment factor calculated in accordance with 2(2).</li> </ul>	

Question	Stakeholder Comments
<b>Preliminary Refund Assessment</b>	
<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>	
<p>Any additional comments regarding the proposed final draft of Section 505.2?</p>	