Stakeholder Comment Matrix – October 26, 2020

Draft Proposed Amended Section 505.2 of the ISO Rules, *Performance Criteria for Refund of Generating Unit Owner's Contribution* ("Section 505.2") – Option 1 Draft Rule Language

Period of Comment:	October 26, 2020	through	November 9, 2020	**Contact:**	Horst Klinkenborg
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Date [yyyy/mm/dd]:	2020/11/09			**Email**:	hklinkenborg@suncor.com

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
Refund of Generating Unit Owner's Contribution	Suncor believes that an availability assessment based on generation types violates FEOC given the purpose of the generation unit owner's contribution.
2 The **ISO** must calculate a refund for each calendar year during the refund period as: $$\text{refund} = \text{annual amount} \times \text{availability assessment}$$ where: (a) annual amount is as specified in the **ISO tariff**; and (b) availability assessment is calculated in accordance with subsection 3, 4, or 5, as applicable.	In light of the base issue of the rule, Suncor has not evaluated this specific section.

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<table>
<tr><th>Question</th><th>Stakeholder Comments</th></tr>
<tr><td></td><td></td></tr>
<tr><td>Availability Assessment for Generation With Energy Market Offers</td><td></td></tr>
<tr><td>
3 Subject to subsections 4 and 5, the ISO must calculate the availability assessment for a generating unit or an aggregated generating facility that submits offers for energy as follows:

(a) identify cumulative time-weighted hourly availability using the available capability of the generating unit or aggregated generating facility in relation to its critical maximum capability;

(b) calculate the average hourly availability by dividing the value determined in subsection 3(a) by the number of hours in the year; and

(c) determine the availability assessment for the generating unit or aggregated generating facility based on the average hourly availability as follows:

<table>
<tr><th>Average Hourly Availability [subsection 3(c)]</th><th>Availability Assessment</th></tr>
<tr><td>Less than 0.60</td><td>0%</td></tr>
<tr><td>0.60 to 0.80</td><td>$\frac{\text{average hourly availability} - 0.60}{0.20} \times 100\%$</td></tr>
<tr><td>Greater than 0.80</td><td>100%</td></tr>
</table>
</td><td>In light of the base issue of the rule, Suncor has not evaluated this specific section.</td></tr>
<tr><td>Availability Assessment for Renewable Generation and Generation with a Maximum Capability Less than 5 MW</td><td></td></tr>
</table>

Question	Stakeholder Comments
4 The **ISO** must calculate the availability assessment for a wind, solar, or run of river hydroelectric **generating unit** or an **aggregated generating facility**, an aggregated asset containing a wind, solar or run of river **generating unit** or **aggregated generating facility**, and a **generating unit** or **aggregated generating facility** with **a maximum capability** less than 5 MW, as follows: (a) identify the cumulative time-weighted hourly availability using the metered energy of the **generating unit** or **aggregated generating facility**, less any volumes dispatched for **operating reserve,** in relation to its critical **maximum capability**; (b) calculate average hourly availability by dividing the value determined in subsection 4(a) by the number of hours in the year; and (c) subject to subsection 4(d), determine the availability assessment for the **generating unit** or **aggregated generating facility** based on the average hourly availability as follows:	In light of the base issue of the rule, Suncor has not evaluated this specific section.

Average Hourly Availability [subsection 4(c)]	Availability Assessment
Less than 0.15	0%
0.15 to 0.25	$\frac{\text{average hourly availability} - 0.15}{0.10} \times 100\%$
Greater than 0.25	100%

(d) determine the availability assessment for a solar **aggregated generating facility** based on the average hourly availability as follows:

Average Hourly Availability [subsection 4(c)]	Availability Assessment
Less than 0.08	0%
0.08 to 0.12	$\frac{\text{average hourly availability} - 0.08}{0.04} \times 100\%$

Question	Stakeholder Comments
Greater than 0.12 | 100%	
Availability Assessment for Behind the Fence Generation with Net Offers	
5 The **ISO** must calculate the availability assessment for a site with 1 or more onsite **generating units** or **aggregated generating facilities** that supplies electric energy for 1 or more onsite load assets and offers excess generation to the energy market on a net basis as follows: (a) identify the cumulative time-weighted hourly availability using the **available capability** of the site in relation to the site's Rate STS **contract capacity**; (b) calculate average hourly availability by dividing the value determined in subsection 6(a) by the number of hours in the year; and (c) determine the availability assessment for the site based on the average hourly availability as follows: Average Hourly Availability [subsection 5(c)] | Availability Assessment Less than 0.60 | 0% 0.60 to 0.80 | $\frac{\text{average hourly availability} - 0.60}{0.20} \times 100\%$ Greater than 0.80 | 100%	In light of the base issue of the rule, Suncor has not evaluated this specific section.
Adjustments	
6 The **ISO** may make adjustments to the hourly availability if the **generating unit** or **aggregated generating facility** is affected by an event outside the control of the **owner** of a **generating unit** or **aggregated generating facility**, including but not	In light of the base issue of the rule, Suncor has not evaluated this specific section.

Question	Stakeholder Comments
limited to a transmission or distribution facility outage, congestion, a **directive** issued by the **ISO** or a circumstance arising under the **ISO tariff** or an **ISO rule**.	
Communication	
7 The **ISO** must provide a preliminary performance assessment, along with all related 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.	In light of the base issue of the rule, Suncor has not evaluated this specific section.