

<p>Period of Comment: March 24, 2021 through April 15, 2021</p> <p>Comments From: Suncor Energy Inc</p> <p>Date: 2021/04/15</p>	<p>Contact: Horst Klinkenberg</p> <p>Phone: (403) 819-7125</p> <p>Email: hklinkenberg@suncor.com</p>
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Instructions:

1. Please fill out the section above as indicated.
2. Please respond to the questions below, and provide your specific comments and proposals (if any).
3. Please provide an estimate of cost and/or time savings associated with your specific comments and proposals (as applicable).

The AESO is seeking comments from Stakeholders on the development of proposed amended Section 103.3 with regard to the following matters:

	General Questions regarding the ISO Rule Development	Stakeholder Comments and/or Proposal	Cost and/or time savings estimate
1.	Do you agree or disagree that the issue and purpose identified in the letter of notice? Please comment.	Suncor is supportive of a review of Section 103.3.	
2.	Do you agree or disagree with the proposed consultation and timelines? Please comment.	At this point the consultation process and timeline seem reasonable. Suncor submits that after initial feedback has been received, the process should be reviewed at or after the May Stakeholder session.	

	General Questions regarding the ISO Rule Development	Stakeholder Comments and/or Proposal	Cost and/or time savings estimate
3.	Do you have any recommended amendments to the proposed amended Section 103.3.	<p>While section 3 of the rule contemplates the total dollar amount of all financial obligations of a market participant to the ISO, this seems to not be consistently applied. For example, credit rating and associated unsecured credit limits should apply to GUOC transactions and potentially negate the need for letters of credit (LC). Recently, Suncor was surprised by the proof of ability to pay exercise in the connection process; a streamlined financial obligation process embed in the connection process could be beneficial.</p> <p>For participants that generally net receive payments from the AESO, more than 2 months should be considered to determine credit requirements for one-off obligations like GUOC.</p> <p>A <i>good standing</i> provision could be considered that only requires financial security from participants that have recently missed payment deadlines.</p>	
4.	Do you have any additional comments?	In cases where an LC is required, the time frame between the time LC is issued and payment/cancellation of the LC should be as short as possible. A time requirement It's not stated in 103.3 when financial security needs to be put up prior to actual payment of a financial obligation.	LC cost is charged daily, e.g. on \$10M the daily cost would be ~\$170/day.