

ISO Rule Proposal



Purpose of the Form

Section 20.81 of the *Electric Utilities Act* requires the AESO to establish a process for market participants and interested parties to propose ISO rules for the AESO's consideration. To propose a new ISO rule, an amendment to an existing ISO rule or a removal of an existing ISO rule, please complete and submit this form.

Completed proposal forms will be posted to the AESO website with Individual Name, Title and Contact Details removed. Please ensure that any confidential or commercially sensitive information submitted with your proposal has been clearly identified.

ISO Rule Proposal Description

1. Proposal Date: As soon as possible at AESO discretion
2. Proposal Type:

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|--|--|--|
| <input type="checkbox"/> New ISO rule(s) | <input checked="" type="checkbox"/> Amend existing ISO rule(s) | <input type="checkbox"/> Removal of existing ISO rule(s) |
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3. Provide a concise description of the issue that the proposed rule is intended to address, the level of urgency, and any industry impacts. Please provide a list of any relevant supporting data, analysis, or materials and include these documents as attachments to this form.

Suncor respectfully requests that the AESO add clarity to the applicability of ISO rule 306.4, Section 4(2), and the impact that Section 4(2) has on Section 4(1). We anticipate that additional clarity from the AESO regarding these sections will ensure that market participants are able to maintain compliance with these rules resulting in better reliability and safety of the electrical system. Document attached: AESO's reply to IR #2022-025 "RE: 2022-025 Seeking Confirmation - ISO 306.4 (Section 4(1) and 4(2)) - Transmission Planned Outage Reporting and Coordination".

4. Provide a description of your proposal to address the issue described in #3. Include the purpose or objective of the proposed new or amended ISO rule. Note that it is not necessary to provide draft rule language.

If a "legal owner of a transmission facility" is unable to comply with ISO rule 306.4, Section 4(1), and is required to "...provide a reason as to why it was unable to submit the cancellation by that deadline", then, the legal owner of a transmission facility must "submit to the ISO a **cancellation** of a planned outage request as soon as possible after the deadline set out in subsection 4(1)". However, it is understood (please refer to AESO's reply to IR #2022-025) that the word "**cancellation**" used in Section 4(2) also includes "changes" to a planned outage request. Accordingly, it would add clarity of Section 4(2) by using the same wording in Section 4(1): "...any changes to a previously submitted planned outage request, including cancellations".

Additionally, if a "legal owner of a transmission facility" is unable to comply with ISO rule 306.4, Section 4(1) and is able to "...provide a reason as to why it was unable to submit the cancellation by that deadline", it is possible for the party to meet the requirements of Section 4(2). In that event, the "legal owner of a transmission facility" will be in compliance with Sections 4(2) and 4(1), as Section 4(1) should not be a mandatory requirement, it is interpreted as a first option.

The suggested draft rule language is:

4(1) “The legal owner of a transmission facility must submit to the ISO any changes to a previously submitted planned outage request, including cancellations, as soon as possible, and no later than 10:00 am on the business day before the first day impacted by the intended change to the previously submitted planned outage request”.

4(2) “The legal owner of a transmission facility must, if it is unable to comply with subsection 4(1) (add “due to unforeseen extraordinary situations”), submit to the ISO a **cancellation of a planned outage request** (change “a cancellation of a planned outage request” for “any changes to a previously submitted planned outage request, including cancellations,”) as soon as possible after the deadline set out in subsection 4(1), and provide a reason as to why it was unable to submit the **cancellation** (change “cancellation” for “change, including cancellations,”) by that deadline”.

5. Provide a list of related ISO rules, Information Documents, and any other relevant AESO documents.

ISO rule section 306.4

Proponent Information

List at least one contact. For additional contacts, copy the table below and include all the requested details for each person. If more than one contact is provided, please identify the main contact.

| | |
|------------------|--|
| Individual Name: | ██████████ |
| Title: | ██ |
| Company Name: | Suncor Energy Inc |
| Contact details: | ██ |

Note that personal information collected on this form will be used to contact you to administer the ISO rule proposal process. This information is collected in accordance with section 33(c) of the *Freedom of Information and Protection of Privacy Act*. Questions related to the handling of personal information can be directed to privacy@aeso.ca.

Submit form to: ruleproposals@aeso.ca