

NOTICE OF SPECIFIED PENALTY

Date of Issue: July 29, 2024		Payment Due Date: August 29, 2024	
MSA File Number	RS2024-061 RS2024-062	Specified Penalty Amount¹	\$ 12,500
Market Participant Name	Suncor Energy Inc.		
Reliability Standard	EOP-011-AB-1	Self-Report	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Requirement	R1, R4	Accepted Mitigation Plan	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Date of Referral/Self Report	March 28, 2024	Date of Contravention	January 1, 2022

MSA FINDINGS

Suncor Energy Inc. did not implement the applicable requirements of EOP-011-AB-1. This is an ongoing contravention starting on January 1, 2022, when EOP-011-AB-1 came into effect.

EOP-011-AB-1 states, in part:

R1 Each operator of a transmission facility must develop, maintain, and, in the event of an operating emergency, implement one or more ISO-reviewed operating plans to mitigate operating emergencies in its area. The operating plans must include the following, as applicable:

R1.1 roles and responsibilities for activating the operating plans;

R1.2 processes to prepare for and mitigate operating emergencies including:

R1.2.1 notification to the ISO, to include current and projected conditions, when experiencing an operating emergency; R1.2.2 coordination with the ISO for the cancellation or recall of transmission facility outages; R1.2.3 requests to the ISO for transmission system reconfiguration; R1.2.4 requests to the ISO to change generation level; R1.2.5 provisions for manual load shedding that minimizes the overlap with automatic load shedding and are capable of being implemented in a timeframe adequate for mitigating the emergency; and R1.2.6 reliability impacts of extreme weather conditions.

R1A The ISO must develop, maintain, and implement one or more operating plans to mitigate operating emergencies on the interconnected electric system. The operating plans must include the following, as applicable:

R1A.1 roles and responsibilities for activating the operating plans;
R1A.2 processes to prepare for and mitigate operating emergencies including:
R1A.2.1 intentionally left blank;
R1A.2.2 cancellation or recall of transmission facility and generating unit outages;
R1A.2.3 transmission system reconfiguration;
R1A.2.4 provisions to issue directives for managing generation level;
R1A.2.5 provisions to issue directives for manual load shedding for mitigating the emergency; and
R1A.2.6 reliability impacts of extreme weather conditions.

MR1 Evidence of developing, maintaining, and implementing operating plans, and having operating plans reviewed as required in requirement R1 exists. Evidence of:

- developing an operating plan may include documented operating plans with effective dates;
- maintaining an operating plan may include documented operating plans with version history;
- implementing an operating plan may include operator logs, voice recordings, system logs, sequence of events records or disturbance reports;
- having operating plan reviewed by the ISO, as applicable, which may include emails; or
- other equivalent evidence.

R4 Each operator of a transmission facility must address any reliability risks the ISO identifies pursuant to requirement R3 and resubmit the related operating plans to the ISO within a time period the ISO specifies.

MR4 Evidence of addressing reliability risks identified in an operating plan as required in requirement R4 exists. Evidence may include dated emails, other correspondence, version history showing that the operator of a transmission facility has responded and updated the operating plan, or other equivalent evidence.

The MSA is satisfied that the conduct was a contravention of Reliability Standard EOP-011-AB-1, requirements R1 and R4.

DELIVERY OF PAYMENT

Payment can be made by electronic funds transfer (EFT). Please reach out to compliance@albertamsa.ca for instructions. When submitting the EFT, please send an email to AU.FinOps@gov.ab.ca, compliance@albertamsa.ca and enforcement@auc.ab.ca noting the MSA file #, market participant name, name as appears on bank account, payment amount and the date of the payment. MSA File #. Questions can be directed to compliance@albertamsa.ca.

NOTICE

The Market Surveillance Administrator (MSA) is granted the power and authority under s. 52 of the *Alberta Utilities Commission Act* to issue a Notice of Specified Penalty where the MSA is satisfied that a person has contravened an Alberta Reliability Standard. Specified penalties are set out in AUC Rule 027.

In accordance with the relevant enactments and rules, a dispute regarding the issuance of a Notice of Specified Penalty or failure to pay the specified penalty in accordance with this notice will result in a hearing or other proceeding before the AUC.

In accordance with s. 5.1 of AUC Rule 027 this Notice of Specified Penalty will be made public no earlier than receipt of confirmation of payment from the Commission and no later than 45 days after issuance. The MSA will, if applicable, also post on its website the link to any decision of the AUC respecting the specified penalty.

If your organization disputes the issuance of this Notice of Specified Penalty, or if you have any other questions or comments regarding this matter, please contact the MSA compliance team at compliance@albertamsa.ca.

APPROVED BY

Mark Nesbitt, Director, Enforcement on July 29, 2024

¹ Specified penalty amount conditional on the completion of the accepted Mitigation Plan.