

NOTICE OF SPECIFIED PENALTY

Date of Issue: July 29, 2024		Payment Due Date: August 29, 2024	
MSA File Number	RS2024-054	Specified Penalty Amount¹	\$ 3,500
Market Participant Name	Suncor Energy Inc.		
Reliability Standard	EOP-008-AB-1	Self-Report	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Requirement	R1	Accepted Mitigation Plan	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Date of Referral/Self Report	March 28, 2024	Date of Contravention	July 29, 2020 ²

MSA FINDINGS

Suncor Energy Inc. did not implement the applicable requirements of EOP-008-AB-1. This is an ongoing contravention starting on July 1, 2019, when EOP-008-AB-1 came into effect.

EOP-008-AB-1 states, in part:

R1 The ISO and each operator of a transmission facility must have a current operating plan describing the manner in which it continues to meet its functional obligations with regard to the reliable operations of the bulk electric system in the event that its primary control centre functionality is lost. This operating plan for backup functionality must include the following, at a minimum:

- (a) the location and method of implementation for providing backup functionality;
- (b) a summary description of the items required to support the backup functionality. These items must include, at a minimum:
 - (i) tools and applications to ensure that system operators have situational awareness of the bulk electric system;
 - (ii) data communications;
 - (iii) voice communications;
 - (iv) power source(s); and
 - (v) physical and cyber security;
- (c) an operating process for keeping the backup functionality consistent with the primary control centre;
- (d) operating procedures, including decision authority, for use in determining when to implement the operating plan for backup functionality;
- (e) a transition period between the decision to transfer functionality to the back up control centre following the loss of primary control centre functionality and the time to fully implement the backup functionality that is less than or equal to two (2) hours; and
- (f) an operating process describing the actions to be taken during the transition period between the loss of primary control centre functionality and the time to fully implement the backup functionality items identified in requirement R1, part (b). The operating process must include at a minimum:
 - (i) a list of all entities to notify when there is a change in operating locations;
 - (ii) actions to manage the risk to the bulk electric system during the transition from primary to backup functionality, as well as during outages of the primary or backup functionality; and
 - (iii) identification of the roles for personnel involved during the initiation and implementation of the operating plan for backup functionality.

MR1 Evidence of having a current operating plan for backup functionality as required in requirement R1 exists. Evidence may include, but is not limited to, a dated, current operating plan with specified elements or other equivalent evidence.

The MSA is satisfied that the conduct was a contravention of Reliability Standard EOP-008-AB-1, requirement R1.

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.

² Alberta Utilities Commission [Rule 027](#), section 3.4(b) four-year period binds.