

## Stakeholder Comment Matrix

### Development of a Proposed Amended ISO rule – Section 501.3 of the ISO rules, *Abbreviated Needs Approval Process*



<b>Period of Comment:</b> September 1, 2021 through October 6, 2021	<b>Contact:</b> Jenny Wang
<b>Comments From:</b> ATCO Electric Ltd.	<b>Phone:</b> (780) 292-2970
<b>Date:</b> [2021/10/06]	<b>Email:</b> Jenny.wang@atco.com

#### Instructions:

1. Please fill out the section above as indicated.
2. Please refer back to the “related material” on the Stakeholder Engagement page on the AESO website.
3. Please respond to the questions below and provide your specific comments, if any. Blank boxes will be interpreted as favourable comments.



The AESO is seeking comments from Stakeholders on the development of proposed amended ISO rule Section 501.3, *Abbreviated Needs Approval Process* (“Section 501.3”), with regard to the following matters:

	Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
1.	Do you agree that the issue identified in the letter of notice requires the proposed development of amended Section 501.3? If not, why not?	Agreed.
2.	Do you agree with the potential purpose of the proposed development of amended Section 501.3? If not, why not?	Agreed.
3.	Do you agree with the proposed consultation and timelines? If not, why not?	Agreed.
4.	Do you agree with the proposed amended Section 501.3? If not, why not?	<p>In general, ATCO agrees with the proposed amendments to remove stringent dollar figure restrictions and definitive prescriptive language currently enshrined within Section 501.3(2) with respect to Eligibility Criteria. Specific dollar figure limitations severely limit the application of the ANAP process.</p> <p>ATCO respectfully suggests, that instead of applying specific dollar figure limitations as suggested, the eligibility criteria should be driven by project scope limitations, as scope criteria has a more direct influence with respect to the applicability of the ANAP process relative to pricing.</p> <p>The AESO has provided several examples of scope considerations within the Rationale section of the comparison matrix which are seemingly based on historical benchmark data. These considerations should be applied to the verbiage of Section 501.3(2) as a more appropriate means of streamlining process. This would allow for substation modifications and additions of equipment, short to medium length radial taps and POD/POSSs, and voltage support additions within existing facilities without the need for a drawn-out NID process. This meets the desire of the AESO to streamline application processes, while not instituting an arbitrary dollar figure cap on the criteria.</p>
5.	Do you have any additional comments?	No further comments.