

Stakeholder Comment Matrix and AESO Response Matrix

2022 ISO Tariff Modernization Application | Proposed Changes to ISO Tariff Written Consultation



Date of Request for Comment:	September 9, 2022
Period of Comment:	September 9, 2022 to October 7, 2022

The AESO received comments from stakeholders regarding the AESO’s proposed ISO tariff revisions, to be included in the 2022 Tariff Modernization Application via the questions set out in the Stakeholder Comment Matrix - 2022 Tariff Modernization Application posted on September 9, 2022. These comments have been posted on the AESO website. Comments were received from the following stakeholders:

1. Alberta Direct Connect;
2. AltaLink;
3. BluEarth Renewables Inc., Elemental Energy Renewables Inc., NAT-1 GP Inc. and RWE Renewables Canada Holding Inc.
4. Campus Energy;
5. Capital Power;
6. ENMAX Corporation;
7. Greengate Power Corporation; and
8. Signalta Resources.

Below you will find the AESO’s responses to the comments received from Stakeholders regarding the 2022 Tariff Modernization Application.

On November 10, 2022, the AESO posted an updated version of the Stakeholder Comment Matrix and AESO Responses Matrix to reflect a correction to ENMAX Corporation and Capital Power’s comments on Question 13.

Questions		Stakeholder Comments	AESO Reponses
1.	a) Is the purpose and objectives of the application clear? Please be specific. b) Are you aligned with the purpose and objectives of the application? c) Are the objectives and process for stakeholder engagement and AESO response clear?	<p><u>Alberta Direct Connect (“ADC”)</u></p> <ol style="list-style-type: none"> 1. ADC appreciates the opportunity to provide comments. A short stakeholder session may have been beneficial to clearly articulate the purpose of this application and to avoid any differences in interpretation of proposed language. 	<ol style="list-style-type: none"> 1. Please see the accompanying update to stakeholders for details regarding further stakeholder engagement. As noted in the update, the AESO has revised the scope of this application and, as a result, does not consider further stakeholder engagement to be necessary.

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	<p><u>AltaLink</u></p> <p>2.</p> <p>a) Yes, the purpose and objectives of this application are clear. However, it would be helpful to understand how this application fits into documentation on the AESO website. Specifically:</p> <p>i. Is this application one of the phases 1, 2A, 2B and 3 as set out on the AESO’s website: https://aeso.ca/rules-standards-and-tariff/tariff/tariff-modernization/ ? When will Phase 2B be dealt with?</p> <p>ii. This application includes a proposed revision to totalization language. Totalization is also dealt with in the Adjusted Metering Practice implementation – but AMP is not mentioned in this application. AMP is also not listed on 2022-2023 Schedule https://aeso.ca/rules-standards-and-tariff/tariff/tariff-related-initiatives/ See comment in Question 9, below.</p> <p>b) AltaLink supports the AESO’s efforts to clarify its Terms and Conditions with respect to its connection process and to keep its documentation in line with existing practice.</p> <p>c) The process is somewhat clear given that a timeline has been posted. It is unclear as to what process steps would follow stakeholder comments if there was not</p>	<p>2.</p> <p>a)</p> <p>i. This application will address a portion of Phase 3 as described on the AESO’s website at www.aeso.ca/rules-standards-and-tariff/tariff/tariff-modernization/. Phase 2B, concerning the AESO’s criteria for system versus connection projects and “grey area” costs, was addressed and approved by the Commission in AUC Proceeding 27015 and AUC Decision 27015-D01-2021.</p> <p>ii. The current totalization provisions approved in Decision 22942-D02-2019 specify that they are applicable only to points of delivery (or points of supply) at <u>separate</u> substations. Prior to Decision 22942-D02-2019, the totalization provisions were silent on whether the points of delivery or points of supply could, for totalization purposes, exist within the same or at separate substations.</p> <p>The distinction of separate substations in the current totalization provisions creates a lack of clarity regarding if and how totalization within the same substation is permitted. A substation may itself be referred to as “a POD” (or “a POS”), implying that a substation has only a single point of delivery (or a single point of supply). However, this ignores the fact that a substation may for many reasons have multiple points of delivery (or points of supply) within it. For example, under the adjusted metering practice (“AMP”), each feeder in a substation that connects to a DFO’s electric distribution system would be a point of delivery (and if applicable, a point of supply). Another example that is unrelated to the AMP would be a substation that serves a non-DFO market participant, such as a transmission-connected generating facility owner, with multiple points of supply.</p>

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	<p>clear alignment with the proposed revisions.</p>	<p>Since multiple points of delivery or supply can exist within the <i>same</i> substation, the ability to totalize those multiple points of delivery (or points of supply) under the same demand transmission service (or supply transmission service) should apply. Without the ability to totalize multiple points of delivery (or points of supply) at the same substation, the AESO would be required to separately contract and bill for each of the points of delivery (and points of supply) within the substation, which is administratively inefficient.</p> <p>The AESO notes that loss factors are also determined for each location that is a point of supply for system access service provided under Rate STS pursuant to Section 501.10 of the ISO rules, <i>Transmission Loss Factors</i>, so an increase in the number of Rate STS agreements would also lead to an increase in the number of loss factors. Additionally, not allowing the totalization of the multiple points of supply in a substation would create an artificial barrier that limits the ability of a market participant to aggregate some or all of its generating units at one or more STS measurement points in the same physical location.</p> <p>The totalization revisions that the AESO is proposing to section 10 of the ISO tariff are identical to the totalization revisions that were previously proposed as part of the AMP application that was considered in AUC Proceeding 27047, <u>with the exception that the revisions now contemplated would apply not only to DFOs, but also to non-DFOs receiving service at a point of demand or point of supply</u>. The AESO first proposed amendments to the current totalization provisions as a part of its previous AMP application because the totalization revisions would have assisted in an administratively efficient implementation of the AMP; however, approval of the totalization revisions would not themselves result in implementation of the AMP.</p>

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	<p><u>Campus Energy</u></p> <p>3.</p> <p>(a) The notice from the AESO doesn't even mention Adjusted Metering Practice (AMP) implementation. It is not clear from the application that the AESO intended to re-file sections of the Tariff that were previously denied by the Commission. There is a lack of AESO transparency in this regard.</p> <p>(b) Campus Energy submits that the AESO is deficient in its compliance of all AUC directions that were provided, including those provided in Decision 27047-D01-2022. (See additional comments below)</p> <p>(c) No.</p>	<p>In light of the comments received from stakeholders regarding the AESO's proposed totalization revisions, the AESO considers that it would be more appropriate to move forward with the totalization provisions as part of the AESO's forthcoming AMP application which, as indicated in the Post-Disposition Notice filed by the AESO on May 31, 2022 in AUC Proceeding 27047, the AESO intends to file in response to Decision 27047-D01-2022.</p> <p>b) The AESO acknowledges AltaLink's comment.</p> <p>c) Please see the accompanying update to stakeholders. As described there, the AESO has removed certain issues, for which there is a lack of alignment, from the scope of this application.</p> <p>3.</p> <p>a) Please see the AESO's response to 2(a)(ii) above. In the AESO's May 31, 2022 Post-Disposition Notice filed in AUC Proceeding 27047, the AESO outlined its next steps in responses to the issuance of Commission Decision 27047-D01-2022. A copy of the notice was posted to the AESO's website and can be found here: https://www.aeso.ca/assets/documents/AESO-Post-Disposition-Notice-to-Stakeholders.pdf</p> <p>b) The AESO acknowledges Campus Energy's comment.</p> <p>c) The AESO acknowledges Campus Energy's comment.</p>

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	<p><u>Capital Power</u></p> <p>4.</p> <p>a) The purpose and objectives are generally clear, however, it is somewhat confusing that some of the proposed changes include ISO tariff revisions proposed by the AESO and currently under consideration in AUC Proceeding 26911. Capital Power understands that these changes (in purple) are not open for comment so have limited our feedback herein to the proposed changes (in red).</p> <p>b) Capital Power is generally aligned with the purpose and objectives.</p> <p>c) Capital Power is generally clear on the objectives and process for stakeholder engagement.</p> <p><u>ENMAX Corporation</u></p> <p>5. While ENMAX understands the general purpose and objectives of the Tariff Modernization Application, it may be more beneficial to see what learnings arise from the AUC’s expected decision on the AESO’s Bulk and Regional Application, as well as Transmission Policy changes, before moving forward with its filing.</p> <p>In general, an information session on the AESO’s tariff modernization efforts would have been beneficial. Depending on the stakeholder comments received, it may be worthwhile holding a follow-up consultation, so stakeholders understand the rationale for</p>	<p>4.</p> <p>a) The changes proposed in AUC Proceeding 26911, regarding the AESO’s Bulk and Regional (“B&R”) tariff design application, were provided solely for reference purposes, to show that they do not overlap with the changes proposed for this application. The changes proposed in AUC Proceeding 26911 will not form part of the AESO’s application.</p> <p>b) The AESO acknowledges Capital Power’s comment.</p> <p>c) The AESO acknowledges Capital Power’s comment.</p> <p>5. The AUC’s decision on the AESO’s B&R application is expected to be issued before the AESO intends to file its modernization application. The AESO will be reviewing the B&R decision and may modify its approach to this application accordingly. Regarding stakeholder engagement, please see the accompanying update to stakeholders.</p>

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	<p>the timing of the application and scope of changes, and to ensure any knock-on effects are addressed.</p> <p><u>Greengate Power Corporation</u></p> <p>6. Greengate finds the purpose to be overall very clear. Most included proposals are concrete, with blackline versions against the previous tariff. It is clear that many proposals are intended to clarify existing tariff components and reduce red tape.</p> <p>Greengate is aligned with the purpose of reducing red tape and aligning the tariff with AESO practices that are already in use to improve clarity around the tariff.</p> <p>Most proposals' process is clear.</p> <p><u>Signalta Resources</u></p> <p>7. See #15 below</p>	<p>6. The AESO acknowledges Greengate Power's comments.</p> <p>7. See the AESO's response to #15 below.</p>
<p>2. Please describe any concerns or agreement with proposed changes to the ISO tariff resulting from changes to definitions</p> <ul style="list-style-type: none"> • Replace current "radial circuit" ISO tariff definition with current Alberta Reliability Standard definition; • New definition of "system transmission facilities" to be adopted into the Consolidated Authoritative Document Glossary (CADG); and 	<p><u>ADC</u></p> <p>8. ADC has no issues with the changes to the definitions.</p> <p><u>AltaLink</u></p> <p>9. Please see AltaLink's comments on the Stakeholder Comment Matrix – Tariff Modernization Definitions.</p>	<p>8. The AESO acknowledges ADC's comments.</p> <p>9. Please see the AESO's response to the Stakeholder Comment Matrix – Tariff Modernization Definitions.</p>

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<ul style="list-style-type: none"> New definition of “permit and licence” to be adopted into the CADG. 	<p><u>Capital Power</u></p> <p>10. Capital Power does not have any concerns with the proposed changes at this time.</p> <p><u>ENMAX Corporation</u></p> <p>11. “System Transmission Facilities” proposed definition – Per the <i>Transmission Regulation</i>, all load bears the cost of the transmission system and are therefore the direct beneficiary of the electricity being delivered. The proposed definition for “system transmission facility” appears contrary to this given it highlights “a required benefit of many market participants”, as opposed to load. We do not support the definition as currently stated and do not think it should be included into the CADG.</p> <p><u>Greengate Power Corporation</u></p> <p>12. Greengate commented in the other stakeholder comment matrix.</p>	<p>10. The AESO acknowledges Capital Power’s comments.</p> <p>11. The description of “system transmission facilities” was approved in AUC Decision 22942-D02-2019 and is part of the current ISO tariff. The definition being proposed by the AESO does not propose any changes to the already approved description and is being proposed solely for the purpose of eliminating repetition within the ISO tariff.</p> <p>12. The AESO acknowledges Greengate’s comments.</p>
<p>3. Please describe any concerns or agreement with proposed changes to Section 3 – System access Service Requests:</p> <ul style="list-style-type: none"> “Critical information”; System access service requests for separate point-of-delivery and point-of-supply; “overall long-term cost” of a connection alternative; 	<p><u>ADC</u></p> <p>13. No concerns. Proposed changes are an improvement.</p> <p><u>AltaLink</u></p> <p>14. Removal of Section 3.4(1)(d) – “Consider effect of Rate DTS and Rate STS separately”</p> <p>a. <i>This item as currently written ensures that load and generation are considered separately so that there is a clear</i></p>	<p>13. The AESO acknowledges ADC’s comments.</p> <p>14.</p> <p>a. The AESO has reviewed this provision and determined that it should remain in the ISO tariff.</p>

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<ul style="list-style-type: none"> Repeated language from TPL reliability standards; Repeated language for cost estimating for connection projects; Redundant subsection 3.4(6); Remove requirement for Construction commitment agreement copy to AESO; Adjust timing for execution of system access service agreements for behind-the-fence and contract processes; Simplify section 3.6(7) Cancellation due to inaction to be included in Section 3, not in the Construction Commitment Agreement 	<p><i>indication as to what is causing incremental transmission facilities i.e., load or generation. Please specify how this delineation will be enacted if this section is removed.</i></p> <p>Critical Information:</p> <ul style="list-style-type: none"> i. removal of Sections 3.2(2) and 3.2(3). – <i>Agreed</i> ii. removal of Section 3.2(4) – <i>This was added in the last GTA at the AESOs request. AltaLink assumes that without this section the AESO will have the information required to make efficient planning decisions regarding DFOs load transfer plans.</i> <p>System access service requests for separate point-of-delivery and point-of-supply:</p> <ul style="list-style-type: none"> iii. removal of Section 3.2(5) – <i>AltaLink assumes this requirement will be part of the requirements listed on the AESO website.</i> <p>“Overall long-term cost” of a connection alternative</p> <ul style="list-style-type: none"> iv. Removal of this phrase from 3.4(1)(a) - <i>Agreed</i> <p>Repeated language from TPL reliability standards</p> <ul style="list-style-type: none"> v. Removal of Sections 3.4(1)(b) and (c) – <i>As the reliability standards do not set out the types of studies for connection</i> 	<ul style="list-style-type: none"> i. Due to stakeholder feedback received, the AESO has decided to remove the revisions proposed to section 3, regarding “critical requirements”, from the scope of this application. These revisions may be proposed by the AESO in a future tariff application. ii. The AESO acknowledges AltaLink’s comment. iii. The AESO acknowledges AltaLink’s comment. iv. Due to stakeholder feedback received, the AESO has decided to remove the revisions proposed to section 3, regarding the “overall long-term cost of a connection alternative”, from the scope of this application. These revisions may be proposed by the AESO in a future tariff application. v. The AESO acknowledges AltaLink’s comment.

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	<p><i>requirements, AltaLink assumes that the AESO will incorporate the language from these sections into their standard processes for determining a preferred alternative.</i></p> <p>Repeated language for cost estimating for connection projects</p> <p>b. Removal of Sections 3.4(4) and (5) - <i>Agreed</i></p> <p>Redundant subsection 3.4(6) - <i>Agreed</i></p> <p>Remove requirement for Construction commitment agreement copy to AESO</p> <p>c. Removal of Section 3.5(2) - <i>Agreed</i></p> <p>Adjust timing for execution of system access service agreements for behind-the-fence and contract processes</p> <p>d. Revision of Section 3.6(1)(b) – timeline to be determined ‘on the AESO website’. <i>Agreed. AltaLink assumes that the AESO will set out in its application what is meant by ‘on the AESO website,’ including how any changes will be communicated to market participants. See final comment.</i></p> <p>Simplify section 3.6(7) - <i>Agreed</i></p> <p>Cancellation due to inaction to be included in Section 3, not in the Construction Commitment Agreement – new Section 3.10 – <i>Agreed</i></p>	<p>b. The AESO acknowledges AltaLink’s comment.</p> <p>c. The AESO acknowledges AltaLink’s comment.</p> <p>d. The AESO acknowledges AltaLink’s comment.</p>

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	<p><u>BluEarth Renewables Inc., Elemental Energy Renewables Inc., NAT-1 GP Inc. and RWE Renewables Canada Holding Inc.</u></p> <p>15. The companies disagree that the removal of “critical information” in current subsection 3.2(2) is an “administrative and non-structural change” that clarifies “existing AESO practices.” Instead, the removal of subsection 3.2(2) and the related changes to subsection 3.9 place connection projects at a greater level of uncertainty. The current “critical information” list and its incorporation into subsection 3.9 means that only changes to System Access Service Requests (“SASR”) which are significant and therefore deemed “critical” can result in the cancellation of the SASR. Removing the “critical information” list and allowing the AESO to cancel a project for any change at all to a SASR is a structural change to the function of the ISO Tariff, and is one which does not serve investor certainty, fairness, or transparency. This is particularly true because of the AESO’s intention – as the companies understand from the proposed changes to subsection 3.2(1) – to rely entirely on information provided on the AESO website for the information requirements for the SASR. The result being that the AESO could create an everchanging list of information, changes to which could result in connection project cancellation, without the regulatory oversight as currently exists when the</p>	<p>15. Due to stakeholder feedback received, the AESO has decided to remove the revisions proposed to section 3, regarding “critical requirements”, from the scope of this application. These revisions may be proposed by the AESO in a future tariff application. Similarly, regarding section 3.9, the AESO has reviewed and agrees to revise the language regarding “cancellation” of a connection project.</p>

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	<p>AESO is proposing to make changes to the ISO Tariff.</p> <p>While subsection 3.2(3) currently allows the AESO to add new “critical information,” the fact that the category of “critical information” exists signifies that only a subset of particularly important changes to a connection proposal incur the risk of project cancellation, reducing uncertainty and promoting fairness and transparency. Moreover, to the best of the companies’ knowledge, the AESO has never added new “critical information,” suggesting that “existing AESO Practice” is to maintain the list of “critical information” in subsection 3.2(2).</p> <p>The companies support the removal of Section 3.2(3), as any additions to the list of “critical information” should be subject to Commission approval in order to enhance investor certainty, but does not support the removal of Section 3.2(2) as it would increase investor uncertainty.</p> <p>In addition to investor certainty, fairness and transparency concerns, the proposed changes to subsections 3.2(2) and 3.9 also do not reduce red tape for market participants, as they have the potential to increase the information which a market participant must be sensitive to, monitor and report, and for which a market participant must make decisions dependent on the risk of cancellation. The time and effort required to evaluate the merit of potentially minor</p>	

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	<p>project changes in light of SASR cancellation risk should not be underestimated. It is also hard to understand how the changes reduce red tape for the AESO, except to the extent that they remove the need for potential ISO Tariff amendments and the attendant regulatory scrutiny, which is in the public interest.</p> <p>Specifically, regarding Section 3.9, the AESO has proposed to change its powers from rejecting an amendment to a SASR to canceling a connection project. The companies request clarity from the AESO regarding its criteria for canceling projects after the generator has received its P&L from the Commission.</p> <p><u>Capital Power</u></p> <p>16. <u>Critical Information</u></p> <p>In proceeding 22942, Capital Power expressed concerns about the AESO introducing “critical information” as a means for reviewing or cancelling a SASR because it did not provide the clarity necessary for market participants to understand the circumstances in which changes will lead to review or cancellation of an SASR. Capital Power does not oppose the removal of “critical information” in and of itself, but still has concern regarding uncertainty for market participants. There is a need for more clarity and transparency on what would trigger a cancellation. Without this added clarity, it is possible that the</p>	<p>16. Due to stakeholder feedback received, the AESO has decided to remove the revisions proposed to section 3, regarding “critical requirements” and the “overall long-term cost of a connection alternative”, from the scope of this application. These revisions may be proposed by the AESO in a future tariff application.</p>

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	<p>proposed change could increase red tape for market participants if, for example, it results in more cancellations as a result of minor changes.</p> <p>The AESO should consult on and establish specific criteria with materiality thresholds, for the review or cancellation of an SASR following a market participant's request for a change in critical information requirements. In addition, clear articulation of the communication and notification requirements for market participants and the AESO with respect to SASR changes are needed to provide more certainty to market participants as to when and why SASRs may be cancelled.</p> <p><u>SASR for separate POD and POS</u></p> <p>Capital Power is supportive of the deletion of subsection 3.2(5).</p> <p><u>“Overall long-term cost”</u></p> <p>Capital Power agrees that more clarity is needed but submits that instead of simply deleting the reference “overall long-term cost”, the AESO should instead provide parameters to better define the term to allow for meaningful estimates of life cycle costs for connection project alternatives. Market participants require more clarity and transparency to understand the AESO's evaluation of connection alternatives. The AESO should provide clear methods for quantifying costs, including the time frame in which cost estimates are provided for. It is</p>	

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	<p>not clear from the proposed change what time period or parameters in which the AESO is evaluating costs.</p> <p><u>Repeated language from TPL reliability standards</u></p> <p>Capital Power does not have any concerns with the proposed change at this time.</p> <p><u>Repeated language for cost estimating</u></p> <p>Capital Power does not have any concerns with the proposed change at this time.</p> <p><u>Redundant subsection 3.4(6)</u></p> <p>Capital Power does not have any concerns with the proposed change at this time.</p> <p><u>Remove requirement for construction commitment agreement copy</u></p> <p>Capital Power does not have any concerns with the proposed change at this time.</p> <p><u>Adjust timing for SAS agreement for BTF and contract processes</u></p> <p>Capital Power does not have any concerns with the proposed change at this time.</p> <p><u>Simplify section 3.6(7)</u></p> <p>Capital Power does not have any concerns with the proposed change at this time.</p> <p><u>Cancellation due to inaction move to Section 3</u></p> <p>Capital Power does not have any concerns with the proposed change at this time.</p>	

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	<p><u>ENMAX Corporation</u></p> <p>17. “Overall Long-Term Cost” of a Connection Alternative – In ENMAX’s view, assessing the overall long-term cost of a connection alternative is an important factor and we do not agree with the proposed removal of this reference. ENMAX suggests revisiting this section to determine how the criteria could be further clarified.</p> <p>“Critical Information” – ENMAX is of the understanding that the AESO would work with the applicant to obtain the critical information necessary rather than rejecting or cancelling a SASR. It should be a starting point for dialogue in many cases between the participant and AESO staff.</p> <p>Reducing Red Tape – For areas where the AESO is looking to reduce red tape and proposing to delete repetitive requirements, ENMAX supports such changes only where market transparency is not being reduced as a result. For language already set out in another Alberta Reliability Standard or AUC Rule, while the requirements may be repetitive, keeping a reference to the relevant rules/standards may be needed.</p> <p><u>Greengate Power Corporation</u></p> <p>18. As long as the AESO acts reasonably, Greengate is not concerned with the proposed changes.</p>	<p>17. Due to stakeholder feedback received, the AESO has decided to remove the revisions proposed to section 3, regarding the “overall long-term cost of a connection alternative”, from the scope of this application. These revisions may be proposed by the AESO in a future tariff application.</p> <p>18. The AESO acknowledges Greengate’s comments.</p>

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4.	<p>Please describe any concerns or agreement with proposed changes to Section 4 – Classification and Allocation of Connection Project Costs:</p> <ul style="list-style-type: none"> Remove unnecessary language regarding “connection project” and “connection project costs” 	<p><u>Alberta Direct Connect (“ADC”)</u></p> <p>19. No concerns</p> <p><u>AltaLink</u></p> <p>20. <i>Agreed.</i></p> <p><u>Capital Power</u></p> <p>21. Capital Power has no concerns with the proposed changes at this time.</p> <p><u>ENMAX Corporation</u></p> <p>22. No comment.</p> <p><u>Greengate Power Corporation</u></p> <p>23. Greengate has no comments to this proposed change.</p>	<p>19. The AESO acknowledges ADC’s comment.</p> <p>20. The AESO acknowledges AltaLink’s comment.</p> <p>21. The AESO acknowledges ADC’s comment.</p> <p>22. The AESO acknowledges ENMAX’s comment.</p> <p>23. The AESO acknowledges Greengate’s comment.</p>
5.	<p>Please describe any concerns or agreement with proposed changes to Section 5 – Changes to System Access Service:</p> <ul style="list-style-type: none"> Simplify language regarding payments and refunds of construction contribution adjustments and payments in lieu of notice 	<p><u>Alberta Direct Connect (“ADC”)</u></p> <p>24. No concerns</p> <p><u>AltaLink</u></p> <p>25. <i>Agreed.</i></p> <p><u>Capital Power</u></p> <p>26. Capital Power has no concerns with the proposed changes at this time.</p> <p><u>ENMAX Corporation</u></p> <p>27. No comment.</p> <p><u>Greengate Power Corporation</u></p> <p>28. Greengate supports the proposed changes to payments in lieu of notice which may</p>	<p>24. The AESO acknowledges ADC’s comment.</p> <p>25. The AESO acknowledges AltaLink’s comment.</p> <p>26. The AESO acknowledges Capital Power’s comment.</p> <p>27. The AESO acknowledges ENMAX’s comment.</p> <p>28. The AESO acknowledges Greengate’s comment.</p>

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		<p>make providing notice more economical for DTS customers.</p>	
6.	<p>Please describe concerns or agreement with proposed changes to Section 6 – Financial Obligations for Connection Projects:</p> <ul style="list-style-type: none"> Align language in figures to ISO tariff and business practice 	<p><u>Alberta Direct Connect (“ADC”)</u></p> <p>29. No concerns</p> <p><u>AltaLink</u></p> <p>30. <i>Agreed. The phrase ‘the ISO’s preferred alternative’ is clearer than ‘the connection proposal.’</i></p> <p><u>Capital Power</u></p> <p>31. Capital Power has no concerns with the proposed changes at this time.</p> <p><u>ENMAX Corporation</u></p> <p>32. No comment.</p>	<p>29. The AESO acknowledges ADC’s comment.</p> <p>30. The AESO acknowledges AltaLink’s comment.</p> <p>31. The AESO acknowledges Capital Power’s comment.</p> <p>32. The AESO acknowledges ENMAX’s comment.</p>
7.	<p>Please describe concerns or agreement with proposed changes to Section 7 – Generating Unit Owner’s Contribution:</p> <ul style="list-style-type: none"> Clarify requirement for evidence of ability to pay GUOC Clarify timing for payment of GUOC Remove transitional language regarding GUOC that are no longer required; Clarity added regarding which GUOC rates are applicable for a generation connection project; 	<p><u>Alberta Direct Connect (“ADC”)</u></p> <p>33. No concerns</p> <p><u>AltaLink</u></p> <p>34. <i>Subject to AltaLink’s concerns with the use of ‘permit and licence’ as set out in the accompanying document ‘AltaLink Stakeholder Comment Matrix Tariff Modernization – Definitions,’ AltaLink agrees with the AESO’s proposed clarifications to Section 7.</i></p>	<p>33. The AESO acknowledges ADC’s comment.</p> <p>34. The AESO acknowledges AltaLink’s comment.</p>

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<ul style="list-style-type: none"> Clarity regarding notification of GUOC and Clarity to address gaps when a generator does not have a STS agreement. 	<p><u>BluEarth Renewables Inc., Elemental Energy Renewables Inc., NAT-1 GP Inc. and RWE Renewables Canada Holding Inc.</u></p> <p>35. The companies support the additional clarity regarding which GUOC rates will apply (based on the timing of GUOC payment evidence provided to the AESO). The addition of this provision provides investor certainty during periods of changing GUOC rates (such as the proposed GUOC rate change effective January 1, 2023).</p> <p>The companies note that this provision of the tariff provides certainty each time there is a GUOC rate change regarding which projects will be subject to old GUOC rates and which projects will be subject to new GUOC rates. Additionally, the GUOC Rates and Yearly Updates Process document¹ posted to the AESO website suggests that the AESO will make public its intention to change GUOC rates approximately 5-6 months in advance of a change. While this is helpful to investor certainty, the AESO has suggested to hold off on filing GUOC rate changes until November each time the rates change. It would be preferable for the proposed rate change to be filed in July, such that market participants have a Commission decision in August/September, rather than a decision in late December as a result of an AESO filing in November. As the Commission can deny or amend the GUOC changes applied for by the AESO, investor certainty is higher after the release of a Commission decision than it is when</p>	<p>35. The AESO acknowledges the companies' comments. While the AESO does not consider the AESO's process for the notification of GUOC rates updates to be within the scope of this application, the AESO will consider this issue as part of its work on future changes to GUOC processes.</p> <p>The AESO has decided to remove the revisions that would result in the timing of GUOC evidence payment and GUOC payment being specified on the AESO's website. These revisions may be proposed by the AESO in a future tariff application.</p>

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	<p>the AESO forecasts its intentions towards an application. The companies do not see any reason for the AESO to wait from July to November to file for known proposed changes and sees investor certainty benefits if the AESO elects to file earlier in the year.</p> <p>The companies understand that the government intends GUOC to be a locational signal and notes that generators make their project siting decisions years in advance of filing of GUOC evidence to the AESO. Accordingly, the more notice a market participant has of applicable future GUOC rates to which they will be subject, the better the price signal sent by GUOC. The proposed notice does not send the appropriate price signal, at either one month or at 4-6 months. The companies understand that GUOC is likely to change following the passing of a new Transmission Regulation and that the AESO intends to make changes to GUOC in 2023. As a result, the companies are holding back the majority of its comments on GUOC until the appropriate time in that consultation.</p> <p>Regarding the changes to subsections 3.6(8) and 3.6(9), the companies do not oppose consolidating these provisions into section 7. However, the companies disagree strongly with the proposal to move the timing of GUOC evidence payment and GUOC payment from the ISO Tariff to the AESO's website. As discussed above, deleting information from the tariff and</p>	

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	<p>relying instead on the AESO website reduces investor certainty and raises questions of transparency and potentially fairness as information on the AESO website can change without notice or oversight.</p> <p><u>Capital Power</u></p> <p>36. <u>Clarify requirement for evidence of ability to pay GUOC</u></p> <p>Capital Power supports the AESO’s efforts to reduce red tape, however, it is unclear if this change achieves this objective or if it simply changes how the requirements are communicated. It is Capital Power’s view that any requirements in which market participants must be compliant should remain in the ISO rules instead of being moved to an Information Document or the AESO website.</p> <p><u>Clarify timing for payment of GUOC</u></p> <p>Capital Power has no concerns with the proposed changes at this time.</p> <p><u>Remove transitional language regarding GUOC that are no longer required</u></p> <p>Capital Power has no concerns with the proposed changes at this time.</p> <p><u>Clarity added regarding which GUOC rates are applicable</u></p> <p>Capital Power has no concerns with the proposed changes at this time. Capital Power supports the added clarity.</p>	<p>36. The AESO acknowledges Capital Power’s comments.</p>

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Questions	Stakeholder Comments	AESO Responses
	<p><u>Clarity regarding notification of GUOC</u></p> <p>Capital Power has no concerns with the proposed changes at this time.</p> <p><u>Clarity to address gaps when a generator does not have a STS agreement</u></p> <p>Capital Power has no concerns with the proposed changes at this time.</p> <p><u>ENMAX Corporation</u></p> <p>37. Refund of GUOC – Subsections 7.5(2) and 7.5(4) should be revised to state that “the clock for refund of the GUOC is tied to the energization date initially identified by the owner of the generating facility [...]. This would eliminate any confusion that may occur if an energization is delayed beyond the time initially identified by the owner.</p> <p>Information Documents – As a general principle, any provisions being moved into an Information Document should not result in a reduction of how much information is provided to the market or inconsistencies with what is required by market participants in any other part of the ISO rules.</p> <p><u>Greengate Power Corporation</u></p> <p>38. “Issue – Refund of GUOC” (Slide 20 of presentation)</p> <ol style="list-style-type: none"> a. The proposed changes to refund criteria of the GUOC (sections 7.5(2) and 7.5(4) should apply to projects moving forward after a 	<p>37. The AESO does not consider the revision suggested by ENMAX to be appropriate. The intent of this provision is to clarify that GUOC is refundable based upon the date <i>initially</i> identified by the owner of a generating facility. The AESO considers this requirement necessary to ensure that the AESO is incenting generating facility owners to provide accurate information, based upon which the AESO can carry out its transmission planning and system access responsibilities.</p> <p>38. The AESO does not consider legacy treatment to be necessary. If a market participant has already paid a GUOC, no changes to the market participant’s GUOC obligations (or GUOC refund entitlements) will result from the AESO’s proposed changes. Additionally, the AESO does not consider GUOC refund relief, as a result of a change beyond a generating unit owner’s control, to be appropriate, as the refundability of a GUOC is intended to function not only as a</p>

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	<p>grandfathering period, given that it is a change in the terms of providing GUOC security. With many projects in the queue, this proposed change would an effective way to avoid causing confusion and would be fair to existing Market Participants.</p> <p>The proposed changes to refund criteria should also include terms to adjust the energization date for calculating a refund to certain listed and specified causes of a delay in ISD. For instance, if a RAS is added to a project following payment of GUOC, it is reasonable for a market participant to be able to adjust its ISD in response, and still receive a full refund.</p>	<p>locational signal, but also as an incentive to achieve “satisfactory performance of a generating unit” in accordance with section 29(5) of the <i>Transmission Regulation</i>.</p>
<p>8. Please describe any concerns or agreement with proposed changes to Section 8 – Ancillary Services:</p> <ul style="list-style-type: none"> Revised section to allow conscripted transmission must run service to be compensated for variable emissions costs. 	<p><u>Alberta Direct Connect (“ADC”)</u></p> <p>39. No concerns</p> <p><u>AltaLink</u></p> <p>40. Agreed.</p> <p><u>Capital Power</u></p> <p>41. Capital Power is supportive of this change and suggests that the AESO should also update the TMR reference price as currently, the TMR reference price does not reflect carbon costs.</p>	<p>39. The AESO acknowledges ADC’s comments.</p> <p>40. The AESO acknowledges AltaLink’s comments.</p> <p>41. The AESO acknowledges Capital Power’s comments; however, TMR reference price is dealt with as part of an ISO rule and not the ISO tariff, and is accordingly beyond the scope of this application.</p>

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	<p><u>ENMAX Corporation</u></p> <p>42. No comment at this time. We are interested how it will work in practice.</p> <p><u>Greengate Power Corporation</u></p> <p>43. Greengate has no comments to this proposed change.</p>	<p>42. The AESO acknowledges ENMAX’s comments.</p> <p>43. The AESO acknowledges Greengate’s comments.</p>
<p>9. Please describe any concerns or agreement with proposed changes to Section 10 – Settlement and Payment Terms:</p> <ul style="list-style-type: none"> New subsection to allow administrative efficiency and permit totalization, for the purposes of ISO tariff billing, of the same service, for the same market participant, within a substation. 	<p><u>Alberta Direct Connect (“ADC”)</u></p> <p>44. No concerns</p> <p><u>AltaLink</u></p> <p>45. <i>Section 10.4 as currently proposed would allow the ISO to totalize multiple points of delivery and multiple points of supply for a market participant. AltaLink proposes that section 10.4 be revised to specifically exclude market participants that are the legal owners of an electric distribution system.</i></p> <p><i>AltaLink notes that totalization with respect to distribution system owners has been put forward by the AESO in its Adjusted Metering Practice Application Appendix C (Exhibit 24047-X0005) but that this has not yet been approved by the AUC.</i></p> <p><u>Campus Energy</u></p> <p>46. In the AESO’s last correspondence regarding AMP, the AESO said that it “requires certain information from the TFOs and DFOs to perform the cost benefit analysis... The AESO also intends to discuss with TFOs the feasibility of the cost</p>	<p>44. The AESO acknowledges ADC’s comments.</p> <p>45. Please see the AESO’s response to 2(a)(ii) above. As noted there, the totalization revisions are required for reasons other than the AMP (for e.g., regardless of the AMP, there could be multiple PODs or POSs at a substation that a single market participant may wish to totalize, for billing and loss factor purposes, in order to receive only a single bill).</p> <p>46. Please see the AESO’s response to 2(a)(ii) above.</p>

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	<p>estimating requirements set out in the Decision, which may be unduly onerous or costly to obtain.” [AESO Post-Disposition Notice - AMP Implementation and Proposed Amendments to s. 502.10 of the ISO Rules (30 June 2022)]</p> <p>The AESO did not provide this information or give proper notice that it intended to include the same AMP provisions in its proposed tariff modernization.</p> <p><u>Capital Power</u></p> <p>47. Capital Power is supportive of this change as it will reduce red tape.</p> <p><u>ENMAX Corporation</u></p> <p>48. No comment at this time. We are interested how it will work in practice.</p> <p><u>Greengate Power Corporation</u></p> <p>49. Greengate has no comments to this proposed change.</p>	<p>47. The AESO acknowledges Capital Power’s comment.</p> <p>48. The AESO acknowledges ENMAX’s comment. Please see the AESO’s response to 2(a)(ii) above; the practical impact of these revisions can be addressed as part of the AESO’s upcoming AMP application.</p> <p>49. The AESO acknowledges Greengate’s comment.</p>
<p>10. Please describe any concerns or agreement with proposed changes to Proforma agreements for the Construction Commitment Agreement, Rate DTS and Rate STS agreements</p> <ul style="list-style-type: none"> Align proformas with current understanding [definitions] of a “point of demand” or “point of supply” at the substation level; and 	<p><u>Alberta Direct Connect (“ADC”)</u></p> <p>50. No concerns</p> <p><u>AltaLink</u></p> <p>51. <i>Agreed.</i></p> <p><i>It would be helpful if the AESO could provide, as part of the application and any compliance filings, blackline copies of these documents where revisions are compared</i></p>	<p>50. The AESO acknowledges ADC’s comment.</p> <p>51. The blacklines of the proformas and CCAs provided by the AESO are based on the proformas and CCAs that form part of the currently approved ISO tariff.</p>

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<ul style="list-style-type: none"> Revised to clarify commissioning for a load facility. 	<p><i>with the Proformas and CCA's <u>currently in effect</u>.</i></p> <p><u>Capital Power</u></p> <p>52. Capital Power has no concerns with the proposed changes at this time.</p> <p><u>ENMAX Corporation</u></p> <p>53. No comment.</p> <p><u>Greengate Power Corporation</u></p> <p>54. Given that the Commission has not approved the Adjusted Metering Practice is the proposed change to less than a substation does not make sense at this time.</p> <p>Greengate has no comments on the load facility commissioning timing.</p>	<p>52. The AESO acknowledges Capital Power's comment.</p> <p>53. The AESO acknowledges ENMAX's comment.</p> <p>54. Please see the AESO's response to 2(a)(ii) above.</p>
<p>11. Please describe any concerns or agreement with the AESO's proposed approach to Direction 9 from AUC Decision 22942-D02-2019, regarding the AESO's discretion to adjust contract capacity</p>	<p><u>Alberta Direct Connect ("ADC")</u></p> <p>55. ADC supports the approach of further stakeholder engagement. Further, the ability to adjust contract capacity may be informed by the AUC's upcoming decision on contract capacity notice requirements as part of the bulk and regional tariff.</p> <p><u>AltaLink</u></p> <p>56. <i>Agreed.</i></p> <p><u>Capital Power</u></p> <p>57. Capital Power has no concerns with the proposed changes at this time.</p>	<p>55. The AESO acknowledges ADC's comment.</p> <p>56. The AESO acknowledges AltaLink's comment.</p> <p>57. The AESO acknowledges Capital Power's comment.</p>

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	Questions	Stakeholder Comments	AESO Responses
		<p><u>ENMAX Corporation</u></p> <p>58. ENMAX agrees that further stakeholder engagement is required on this topic before any scenarios are formally adopted in which the AESO uses discretion to adjust contract capacity in the future.</p> <p><u>Greengate Power Corporation</u></p> <p>59. It is unclear when the AESO plans to conduct this consultation, and it has been discussed for some time. Greengate recommends that the AESO provide a proposed timeline.</p> <p>Before the AESO provides scenarios where it would exercise this power, it would be useful to MPs to understand what types of MPs it would apply to. Will it apply to DTS users and STS users? Will it apply to DOS users, and does the AESO intend to apply it to users of its proposed MDOS?</p> <p>Greengate recommends that this section of the filing should not be made until the Commission rules on the AESO tariff it has under review, which contains the proposed MDOS.</p>	<p>58. The AESO acknowledges ENMAX’s comment.</p> <p>59. The AESO acknowledges Greengate’s comment, and will provide a consultation timeline when it becomes available.</p>
12	Please describe any concerns or agreement with the AESO’s proposed approach to Direction 10 from AUC Decision 22942-D02-2019, regarding the AESO’s selection of a preferred connection alternative, in light of the	<p><u>Alberta Direct Connect (“ADC”)</u></p> <p>60. ADC supports simplification of this requirement.</p> <p><u>AltaLink</u></p> <p>61. <i>Agreed.</i></p>	<p>60. The AESO acknowledges ADC’s comments.</p> <p>61. The AESO acknowledges AltaLink’s comments.</p>

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<p>AESO's proposed revisions to subsection 3.4(1)</p>	<p><u>Capital Power</u></p> <p>62. Capital Power has no concerns with the proposed approach in general. However, it would be helpful to understand how the AESO plans to conduct the future stakeholder consultation and ensure that “consensus” can be achieved as per the direction.</p> <p><u>ENMAX Corporation</u></p> <p>63. See response to Question 3.</p> <p><u>Greengate Power Corporation</u></p> <p>64. Greengate agrees with the AESO that long term costs is confusing and simplification is required.</p>	<p>62. The AESO acknowledges Capital Power's comments. Given the lack of stakeholder alignment on this issue, the AESO will be considering how best to engage with stakeholders in order to address concerns arising with the application of subsection 3.4(1), including with respect to its proposed deletion of the phrase “overall long-term cost of a connection alternative”.</p> <p>63. See the AESO's response to question 3.</p> <p>64. The AESO acknowledges Greengate's comment.</p>
<p>13 Please describe any concerns or agreement with the AESO's proposed approach to Direction 11 from AUC Decision 22942-D02-2019, regarding the “critical information” requirements for SASRs, in light of the AESO's proposed revisions to subsection 3.2</p>	<p><u>Alberta Direct Connect (“ADC”)</u></p> <p>65. No concerns</p> <p><u>AltaLink</u></p> <p>66. <i>Agreed.</i></p> <p><u>Capital Power</u></p> <p>67. Capital Power submits that the proposed revisions to subsection 3.2 do not address the concerns that were raised in proceeding 22942, as the circumstances under which AESO will trigger a review or cancellation of SASRs is still unclear. The AESO should be very clear in the rules about what changes will trigger a review and what changes will trigger a cancellation. The AESO should consult with stakeholder to establish specific criteria with materiality thresholds</p>	<p>65. The AESO acknowledges ADC's comments.</p> <p>66. The AESO acknowledges AltaLink's comments.</p> <p>67. Given the lack of stakeholder alignment on this issue, the AESO will be considering how best to engage with stakeholders in order to address concerns arising with the existing “critical requirements” provisions in section 3, and the AESO's proposed revisions. The AESO's existing Information Document ID 2018-018T, <i>Provision of System Access Service and the AESO's Connection Process</i> sets out the AESO's SASR cancellation criteria.</p>

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	Questions	Stakeholder Comments	AESO Responses
		<p>for the review or cancellation of a SASR following a market participant's request for a change in critical information requirements</p> <p><u>ENMAX Corporation</u></p> <p>68. See response to Question 3.</p> <p><u>Greengate Power Corporation</u></p> <p>69. As long as the AESO acts reasonably, Greengate can support the proposed changes.</p>	<p>68. The AESO acknowledges ENMAX's comments.</p> <p>69. The AESO acknowledges Greengate's comments.</p>
14	<p>Please describe any concerns or agreement with the AESO's proposed approach to Direction 20 from AUC Decision 22942-D02-2019, regarding the costs of transmission line relocations</p>	<p><u>Alberta Direct Connect ("ADC")</u></p> <p>70. No Comments</p> <p><u>AltaLink</u></p> <p>71. <i>Agreed.</i></p> <p><u>Capital Power</u></p> <p>72. Capital Power has no concerns with the proposed changes at this time. It would be helpful if the AESO could clarify instances where the costs of transmission line relocations are clearly system costs (not participant related).</p> <p><u>ENMAX Corporation</u></p> <p>73. No comment.</p> <p><u>Greengate Power Corporation</u></p> <p>74. Greengate has no comments to this proposed change.</p>	<p>70. The AESO acknowledges ADC's comments.</p> <p>71. The AESO acknowledges AltaLink's comments.</p> <p>72. The AESO acknowledges Capital Power's comments.</p> <p>73. The AESO acknowledges ENMAX's comments.</p> <p>74. The AESO acknowledges Greengate's comments.</p>

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15.	Additional comments	<p><u>Alberta Direct Connect (“ADC”)</u></p> <p>75. Further changes are anticipated as an outcome of the Bulk and Regional tariff decision. Is this proposal intended to be filed as a stand-alone application or part of a compliance filing? If stand-alone, should the proposed language that was also included in the Bulk and Regional application be removed from the application until the decision is published?</p> <p><u>AltaLink</u></p> <p>76. <i>AltaLink would like to see the AESO include its specific proposal for ‘on the AESO website’ as referenced throughout the draft revisions, as well as the manner in which changes will be communicated to market participants.</i></p> <p><u>BluEarth Renewables Inc., Elemental Energy Renewables Inc., NAT-1 GP Inc. and RWE Renewables Canada Holding Inc.</u></p> <p>77. On May 18, 2022, the three of the companies (BluEarth, Elemental, and RWE) presented to the Alberta Ministry of Energy (“the government”) regarding its concerns about the definition of local interconnection costs. Based on the final consultation session, it does not appear that the government is likely to take any steps to address these concerns at a statutory level. As it stands, Section 28(1)(a) of the Transmission Regulation notes that</p>	<p>75. The changes proposed in AUC Proceeding 26911, regarding the AESO’s Bulk and Regional (“B&R”) tariff design application, were provided solely for reference purposes, to show that they do not overlap with the changes proposed for this application. The changes proposed in AUC Proceeding 26911 are part of a separate application and will not form part of the AESO’s 2022 Tariff Modernization Application.</p> <p>76. It is the AESO’s intention for any details that would be specified “on the website” to relate to matters of timing (and more specifically, <i>Connection Process</i> timing), and any such changes would be communicated to market participants with reasonable, advance notice.</p> <p>77. The definition of “local interconnection costs” and the framework for participant- and system-related costs are not within the scope of the AESO’s application. The issue of whether changes should be made to the AESO’s existing and well-established contribution policy will be considered as part of the AESO’s upcoming holistic contribution policy review.</p>

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	<p>generators will pay “local interconnection costs, as defined by the ISO”, placing responsibility for a just and reasonable definition of those costs on the AESO. Accordingly, the companies submit that these concerns must be considered in this consultation and the subsequent regulatory proceeding in front of the Alberta Utilities Commission, in order to resolve the ongoing rate fairness, efficiency and cost-signal issues which the companies submit result from the AESO’s current interpretation of local interconnection costs.</p> <p>As noted in the presentation to government, generators are currently directly paying for items that should rightly be system costs, including:</p> <ul style="list-style-type: none"> • Costs to remove underbuilt cables • Telecommunication costs • System transmission line upgrades • Substation upgrades • Protection and control upgrades <p>The fact that generators are paying system costs:</p> <ul style="list-style-type: none"> • Raises the question of transmission rights as the Transmission Regulation requires generators to pay for system costs. 	

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	<ul style="list-style-type: none"> Raises concerns double counting with GUOC. The charge that became GUOC was originally defined in the Transmission Development Policy paper as “a financial commitment and payment towards transmission system upgrades”. <p>The companies recommended to the government and continues to recommend that local interconnection costs should be limited to those directly required to connect the generator.</p> <p>In support of this recommendation, the companies outlined how the current methodology for billing local interconnection costs results in fairness concerns between DCGs and TCGs by describing the following case study:</p> <ul style="list-style-type: none"> Case Study: Proceeding 26510. Removal of a distribution line underbuild and assigning of costs to the generator. Background: When four DCGs connected in the Strathmore planning area, the AESO noted that loading of 765L may exceed its present ratings. Two solutions to this problem were available: (1) upgrade the transmission line to increase its rating; or (2) relocate the distribution line underbuild allowing the transmission line to operate at full capacity. Relocating the 	

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	<p>underbuild was determined to be the preferred solution.</p> <ul style="list-style-type: none"> Decision: As part of Capital Power's DCG connection costs, it would pay for the cost of relocating the underbuild. In a different situation, the DCG would not have been charged those costs. (Explored in the IRs) Situation 1: If all four projects were TCGs instead of DCGs, then the costs to relocate the underbuild would still have been considered distribution driven costs and none of the connecting TCGs would have had to pay for the relocation of the underbuild as a part of their connection costs. Situation 2: If instead of relocating the distribution underbuild, the optimal solution to the transmission capacity issue was determined to be AltaLink upgrading the transmission line, then those costs would have been considered system and would not have been charged to any of the four DCGs. <p>These concerns are important to resolve in this consultation and the subsequent regulatory proceeding to enhance investor certainty and generator fairness at a time when the system is transitioning to renewable energy and needs to continue to attract new capital.</p> <p>The companies understand that the AESO intends to "The AESO will compile and post</p>	

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	<p>a directional, high-level summary of the feedback received on or before October 21, 2022.” In consultations such as this, the AESO frequently also responds to stakeholder comments. The companies request the AESO’s reply regarding the importance of this issue given the evolving application of local interconnection costs.</p> <p><u>Campus Energy</u></p> <p>78. Re-introducing the exact changes denied in Proceeding 27047 will waste the AUC’s time and resources.</p> <p><u>Capital Power</u></p> <p>79. While Capital Power believes that for many of the proposed changes a written process to review these changes is useful. For the more complex changes, such as the AESO’s proposed approaches to Directions from AUC Decision 22942-D02-2019, there would be value in having an interactive two-way dialog which facilitates a more efficient exchange of information allowing for better understanding and improved opportunities for exchanging views.</p> <p><u>Greengate Power Corporation</u></p> <p>80. The AESO’s plans to file these changes on or around November 4 may be of concern to Greengate, if there are any relevant directions in the currently proposed Tariff under review by the Commission at the moment that conflict or complicate the AESO’s upcoming filing.</p>	<p>78. Please see the AESO’s response to 2(a)(ii) above.</p> <p>79. Please see the accompanying notice to stakeholders for further details regarding stakeholder engagement.</p> <p>80. The AESO acknowledges Greengate’s comment.</p>

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Questions	Stakeholder Comments	AESO Responses
	<p><u>Signalta Resources</u></p> <p>81. Notwithstanding the stated purpose and intent of the AESO’s proposed tariff modernization application, a review of the proposed updates shows that the same amended tariff provisions denied by the AUC in the AMP Application forms part of the “modernized” AESO tariff. For example, the introduction of a new section 10.4 reads exactly the same as what the AESO proposed in the AMP Application. The AUC refused the AESO’s application to introduce these changes in Decision 27047-D01-2022.</p> <p>In addition, the notice provided by the AESO does not reference AMP Implementation, which is contrary to the AESO’s last correspondence regarding AMP. In this regard, the AESO essentially said that it “requires certain information from the TFOs and DFOs to perform the cost benefit analysis described in ... Decision [27047-D01-2022]. The AESO also intends to discuss with TFOs the feasibility of the cost estimating requirements set out in the Decision, which may be unduly onerous or costly to obtain.” [see <i>AESO Post-Disposition Notice - AMP Implementation and Proposed Amendments to s. 502.10 of the ISO Rules, dated June 30, 2022</i>]. However, the AESO did not provide this information or give proper notice that it intended to include the AMP provisions in its current proposed tariff modernization. Seeking to re-introduce these changes in</p>	<p>81. Please see the AESO’s response to 2(a)(ii) above.</p>

Stakeholder Comment Matrix and AESO Response Matrix

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	<p>this manner will only result in a waste of the AUC's time and resources. Also, by failing to give proper notice, it is not possible for the AESO to claim they properly consulted on these changes.</p> <p>The foregoing highlights that the AESO is not acting in a transparent manner, which appears contrary to its obligation under the EUA to act responsibly, and opens the door to valid complaints to the AUC.</p>	