

Stakeholder Comments – 2022 Tariff Modernization Application

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.

Thank you to all stakeholders who participated in this consultation. If you have any questions, please submit them to tariffdesign@aeso.ca.

Stakeholder Comment Matrix – September 9, 2022

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



Comment period:	September 9, 2022, to October 7, 2022	Contact:	Colette Chekerda
Comments from:	Alberta Direct Connect “ADC:	Email:	colette@carmal.ca
Date:	2022/10/07		

Instructions

1. Please fill out the section above as indicated.
2. Please respond to the questions below and provide your specific comments.
3. **Please submit one completed comment matrix per organization.**
4. **Stakeholder comment matrices will be published on aeso.ca, in their original state.**
5. Email your completed comment matrix to tariffdesign@aesoc.ca by **Oct. 7, 2022**.

Purpose and intention

The AESO’s forthcoming 2022 Tariff Modernization Application is intended to propose revisions to the terms and conditions of the ISO tariff to better align with, and to provide stakeholders with clarity regarding existing AESO practices and process regarding system access service requests. The application is also intended to propose a structural change to the compensation formula that exists for the provision of conscripted transmission must-run (TMR) service in Section 8 of the ISO tariff, *Ancillary Services*, so that generators can be compensated for emissions compliance costs associated with the provision of conscripted TMR service. The application is also intended to speak to outstanding directions issued by the Alberta Utilities Commission in Decision 22942-D02-2019 regarding the AESO’s 2018 comprehensive ISO tariff application.

Request for feedback

The AESO is seeking comments from Stakeholders on the AESO’s proposed application. Please be as specific as possible with your responses. Thank you.

Questions		Stakeholder Comments
1.	a) Is the purpose and objectives of the application clear? Please be specific.	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.



Questions	Stakeholder Comments
<p>b) Are you aligned with the purpose and objectives of the application?</p> <p>c) Are the objectives and process for stakeholder engagement and AESO response clear?</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 • New definition of “permit and licence” to be adopted into the CADG. 	<p>ADC has no issues with the changes to the definitions.</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; • Repeated language from TPL reliability standards; 	<p>No concerns. Proposed changes are an improvement.</p>

Questions	Stakeholder Comments
<ul style="list-style-type: none"> • 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>4. 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” 	No concerns
<p>5. 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 	No concerns
<p>6. Please describe concerns or agreement with proposed changes to Section 6 – Financial Obligations for Connection Projects:</p>	No concerns

	Questions	Stakeholder Comments
	<ul style="list-style-type: none"> Align language in figures to ISO tariff and business practice 	
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; Clarity regarding notification of GUOC and Clarity to address gaps when a generator does not have a STS agreement. 	No concerns
8.	<p>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. 	No concerns
9.	<p>Please describe any concerns or agreement with proposed changes to Section 10 – Settlement and Payment Terms:</p>	No concerns

Questions	Stakeholder Comments
<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>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 Revised to clarify commissioning for a load facility. 	No concerns
<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>	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>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 AESO’s proposed revisions to subsection 3.4(1)</p>	ADC supports simplification of this requirement.
<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,</p>	No concerns

Questions		Stakeholder Comments
	in light of the AESO's proposed revisions to subsection 3.2	
14	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	No Comments
15.	Additional comments	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?

Thank you for your input. Please email your completed matrix to: tariffdesign@aeso.ca

Stakeholder Comment Matrix – September 9, 2022

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



Comment period:	September 9, 2022, to October 7, 2022	Contact:	Joe Petratur
Comments from:	AltaLink	Email:	Joe.Petratur@AltaLink.ca
Date:	2022/10/07		

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Purpose and intention

The AESO's forthcoming 2022 Tariff Modernization Application is intended to propose revisions to the terms and conditions of the ISO tariff to better align with, and to provide stakeholders with clarity regarding existing AESO practices and process regarding system access service requests. The application is also intended to propose a structural change to the compensation formula that exists for the provision of conscripted transmission must-run (TMR) service in Section 8 of the ISO tariff, *Ancillary Services*, so that generators can be compensated for emissions compliance costs associated with the provision of conscripted TMR service. The application is also intended to speak to outstanding directions issued by the Alberta Utilities Commission in Decision 22942-D02-2019 regarding the AESO's 2018 comprehensive ISO tariff application.

Request for feedback

The AESO is seeking comments from Stakeholders on the AESO's proposed application. Please be as specific as possible with your responses. Thank you.

Questions		Stakeholder Comments
1.	a) Is the purpose and objectives of the application clear? Please be specific.	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:



Questions	Stakeholder Comments
<p>b) Are you aligned with the purpose and objectives of the application?</p> <p>c) Are the objectives and process for stakeholder engagement and AESO response clear?</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-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 clear alignment with the proposed revisions.</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 • New definition of “permit and licence” to be adopted into the CADG. 	<p>Please see AltaLink’s comments on the Stakeholder Comment Matrix – Tariff Modernization Definitions.</p>

Questions	Stakeholder Comments
<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; • 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>Removal of Section 3.4(1)(d) – “Consider effect of Rate DTS and Rate STS separately”</p> <ul style="list-style-type: none"> - <i>This item as currently written ensures that load and generation are considered separately so that there is a clear 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>Critical Information:</p> <ul style="list-style-type: none"> - removal of Sections 3.2(2) and 3.2(3). – <i>Agreed</i> - 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"> - 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"> - 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"> - Removal of Sections 3.4(1)(b) and (c) – <i>As the reliability standards do not set out the types of studies for connection requirements, AltaLink assumes that the AESO will incorporate the language from these sections into their standard processes for determining a preferred alternative.</i> <p>Repeated language for cost estimating for connection projects</p> <ul style="list-style-type: none"> - Removal of Sections 3.4(4) and (5) - <i>Agreed</i> <p>Redundant subsection 3.4(6) - <i>Agreed</i></p> <p>Remove requirement for Construction commitment agreement copy to AESO</p> <ul style="list-style-type: none"> - Removal of Section 3.5(2) - <i>Agreed</i> <p>Adjust timing for execution of system access service agreements for behind-the-fence and contract processes</p>

Questions	Stakeholder Comments
	<ul style="list-style-type: none"> - 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>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>4. 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><i>Agreed.</i></p>
<p>5. 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><i>Agreed.</i></p>
<p>6. 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><i>Agreed. The phrase ‘the ISO’s preferred alternative’ is clearer than ‘the connection proposal.’</i></p>
<p>7. Please describe concerns or agreement with proposed changes to Section 7 – Generating Unit Owner’s Contribution:</p>	<p><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>

Questions	Stakeholder Comments
<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; • Clarity regarding notification of GUOC • and • Clarity to address gaps when a generator does not have a STS agreement. 	
<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><i>Agreed.</i></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><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>

Questions	Stakeholder Comments
<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 Revised to clarify commissioning for a load facility. 	<p><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 with the Proformas and CCA's <u>currently in effect</u>.</i></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><i>Agreed.</i></p>
<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 AESO's proposed revisions to subsection 3.4(1)</p>	<p><i>Agreed.</i></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><i>Agreed.</i></p>
<p>14. Please describe any concerns or agreement with the AESO's proposed approach to Direction 20</p>	<p><i>Agreed.</i></p>

Questions		Stakeholder Comments
	from AUC Decision 22942-D02-2019, regarding the costs of transmission line relocations	
15.	Additional comments	<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>

Thank you for your input. Please email your completed matrix to: tariffdesign@aeso.ca

Stakeholder Comment Matrix – September 9, 2022

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



Comment period:	September 9, 2022, to October 7, 2022	Contact:	Christine Runge
Comments from:	This is a joint submission by BluEarth Renewables Inc., Elemental Energy Renewables Inc., NAT-1 GP Inc., and RWE Renewables Canada Holding Inc (the “companies”). This submission represents the consensus view of the companies and is submitted on behalf of the companies by Power Advisory LLC.	Email:	crunge@poweradvisoryllc.com
Date:	2022-10-07		

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Request for feedback

The AESO is seeking comments from Stakeholders on the AESO’s proposed application. Please be as specific as possible with your responses. Thank you.



Questions	Stakeholder Comments
<p>1.</p> <ul style="list-style-type: none"> 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>2.</p> <p>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 • New definition of “permit and licence” to be adopted into the CADG. 	
<p>3.</p> <p>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>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</p>

Questions	Stakeholder Comments
<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>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 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 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</p>

Questions	Stakeholder Comments
	request clarity from the AESO regarding its criteria for canceling projects after the generator has received its P&L from the Commission.
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”
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
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
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
	<p>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</p>

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<ul style="list-style-type: none"> • Remove transitional language regarding GUOC that are no longer required; • Clarity added regarding which GUOC rates are applicable for a generation connection project; • Clarity regarding notification of GUOC • and • Clarity to address gaps when a generator does not have a STS agreement. 	<p>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 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</p>

¹ <https://www.aeso.ca/assets/GUOC-Rates-and-Yearly-Updates-Process-V1-FINAL.pdf>

Questions	Stakeholder Comments
	<p>from the tariff and 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>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>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>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 Revised to clarify commissioning for a load facility. 	

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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 AESO's proposed revisions to subsection 3.4(1)	
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	
14	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	
15.	Additional comments	<p>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 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</p>

Questions	Stakeholder Comments
	<p>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. • 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 underbuild was determined to be the preferred solution.

Questions	Stakeholder Comments
	<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 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>

Thank you for your input. Please email your completed matrix to: tariffdesign@aeso.ca

Stakeholder Comment Matrix – September 9, 2022

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



Comment period:	September 9, 2022, to October 7, 2022	Contact:	C. Hughes
Comments from:	Campus Energy	Email:	cameron.hughes@campusenergy.ca
Date:	2022/10/07		

Instructions

1. Please fill out the section above as indicated.
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Purpose and intention

The AESO's forthcoming 2022 Tariff Modernization Application is intended to propose revisions to the terms and conditions of the ISO tariff to better align with, and to provide stakeholders with clarity regarding existing AESO practices and process regarding system access service requests. The application is also intended to propose a structural change to the compensation formula that exists for the provision of conscripted transmission must-run (TMR) service in Section 8 of the ISO tariff, *Ancillary Services*, so that generators can be compensated for emissions compliance costs associated with the provision of conscripted TMR service. The application is also intended to speak to outstanding directions issued by the Alberta Utilities Commission in Decision 22942-D02-2019 regarding the AESO's 2018 comprehensive ISO tariff application.

Request for feedback

The AESO is seeking comments from Stakeholders on the AESO's proposed application. Please be as specific as possible with your responses. Thank you.

Questions		Stakeholder Comments
1.	a) Is the purpose and objectives of the application clear? Please be specific.	(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.



Questions	Stakeholder Comments
<p>b) Are you aligned with the purpose and objectives of the application?</p> <p>c) Are the objectives and process for stakeholder engagement and AESO response clear?</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>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 • New definition of “permit and licence” to be adopted into the CADG. 	
<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; • Repeated language from TPL reliability standards; 	

Questions	Stakeholder Comments
<ul style="list-style-type: none"> • 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>4. 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>5. 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>6. Please describe concerns or agreement with proposed changes to Section 6 – Financial Obligations for Connection Projects:</p>	

Questions	Stakeholder Comments
<ul style="list-style-type: none"> Align language in figures to ISO tariff and business practice 	
<p>7. 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; Clarity regarding notification of GUOC and Clarity to address gaps when a generator does not have a STS agreement. 	
<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>9. Please describe any concerns or agreement with proposed changes to Section 10 – Settlement and Payment Terms:</p>	<p>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 estimating requirements set out in the Decision, which may be unduly onerous or costly to obtain.”</p>

Questions		Stakeholder Comments
	<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><i>[AESO Post-Disposition Notice - AMP Implementation and Proposed Amendments to s. 502.10 of the ISO Rules (30 June 2022)]</i></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>
10.	<p>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 Revised to clarify commissioning for a load facility. 	
11.	<p>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>	
12	<p>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 AESO’s proposed revisions to subsection 3.4(1)</p>	
13	<p>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,</p>	

Questions		Stakeholder Comments
	in light of the AESO's proposed revisions to subsection 3.2	
14	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	
15.	Additional comments	Re-introducing the exact changes denied in Proceeding 27047 will waste the AUC's time and resources.

Thank you for your input. Please email your completed matrix to: tariffdesign@aeso.ca

Stakeholder Comment Matrix – September 9, 2022

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



Comment period:	September 9, 2022, to October 7, 2022	Contact:	Megan Gill
Comments from:	Capital Power	Email:	mgill@capitalpower.com
Date:	2022/10/07		

Instructions

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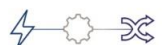
Purpose and intention

The AESO's forthcoming 2022 Tariff Modernization Application is intended to propose revisions to the terms and conditions of the ISO tariff to better align with, and to provide stakeholders with clarity regarding existing AESO practices and process regarding system access service requests. The application is also intended to propose a structural change to the compensation formula that exists for the provision of conscripted transmission must-run (TMR) service in Section 8 of the ISO tariff, *Ancillary Services*, so that generators can be compensated for emissions compliance costs associated with the provision of conscripted TMR service. The application is also intended to speak to outstanding directions issued by the Alberta Utilities Commission in Decision 22942-D02-2019 regarding the AESO's 2018 comprehensive ISO tariff application.

Request for feedback

The AESO is seeking comments from Stakeholders on the AESO's proposed application. Please be as specific as possible with your responses. Thank you.

Questions	Stakeholder Comments
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?	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



Questions	Stakeholder Comments
<p>c) Are the objectives and process for stakeholder engagement and AESO response clear?</p>	<p>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>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 • New definition of “permit and licence” to be adopted into the CADG. 	<p>Capital Power does not have any concerns with the proposed changes at this time.</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; • Repeated language from TPL reliability standards; 	<p><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 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</p>

Questions	Stakeholder Comments
<ul style="list-style-type: none"> • 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 • Other 	<p>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> Capital Power is supportive of the deletion of subsection 3.2(5).</p> <p><u>“Overall long-term cost”</u> 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 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> Capital Power does not have any concerns with the proposed change at this time.</p> <p><u>Repeated language for cost estimating</u> Capital Power does not have any concerns with the proposed change at this time.</p> <p><u>Redundant subsection 3.4(6)</u> Capital Power does not have any concerns with the proposed change at this time.</p>

Questions	Stakeholder Comments
	<p><u>Remove requirement for construction commitment agreement copy</u> 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> Capital Power does not have any concerns with the proposed change at this time.</p> <p><u>Simplify section 3.6(7)</u> 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> Capital Power does not have any concerns with the proposed change at this time.</p>
<p>4. 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>Capital Power has no concerns with the proposed changes at this time.</p>
<p>5. 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>Capital Power has no concerns with the proposed changes at this time.</p>

	Questions	Stakeholder Comments
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>Capital Power has no concerns with the proposed changes at this time.</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; Clarity regarding notification of GUOC and Clarity to address gaps when a generator does not have a STS agreement. 	<p><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><u>Clarity regarding notification of GUOC</u></p> <p>Capital Power has no concerns with the proposed changes at this time.</p>

Questions		Stakeholder Comments
		<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>
8.	<p>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>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>
9.	<p>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>Capital Power is supportive of this change as it will reduce red tape.</p>
10.	<p>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 Revised to clarify commissioning for a load facility. 	<p>Capital Power has no concerns with the proposed changes at this time.</p>

Questions	Stakeholder Comments
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
	Capital Power has no concerns with the proposed changes at this time.
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 AESO's proposed revisions to subsection 3.4(1)
	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.
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
	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 for the review or cancellation of a SASR following a market participant's request for a change in critical information requirements
14	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
	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).
15.	Additional comments
	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.

Thank you for your input. Please email your completed matrix to: tariffdesign@ieso.ca

Stakeholder Comment Matrix – September 9, 2022

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



Comment period:	September 9, 2022, to October 7, 2022	Contact:	Mark McGillivray
Comments from:	ENMAX Corporation	Email:	MMcGillivray@enmax.com
Date:	2022/10/07		

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Request for feedback

The AESO is seeking comments from Stakeholders on the AESO's proposed application. Please be as specific as possible with your responses. Thank you.

Questions		Stakeholder Comments
1.	a) Is the purpose and objectives of the application clear? Please be specific.	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.



Questions	Stakeholder Comments
<p>b) Are you aligned with the purpose and objectives of the application?</p> <p>c) Are the objectives and process for stakeholder engagement and AESO response clear?</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 the timing of the application and scope of changes, and to ensure any knock-on effects are addressed.</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 • New definition of “permit and licence” to be adopted into the CADG. 	<p>“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>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; • Repeated language from TPL reliability standards; 	<p>“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</p>

Questions	Stakeholder Comments
<ul style="list-style-type: none"> • 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>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>4. 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>No comment.</p>
<p>5. 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>No comment.</p>
<p>6. Please describe concerns or agreement with proposed changes to Section 6 – Financial Obligations for Connection Projects:</p>	<p>No comment.</p>

	Questions	Stakeholder Comments
	<ul style="list-style-type: none"> Align language in figures to ISO tariff and business practice 	
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; Clarity regarding notification of GUOC and Clarity to address gaps when a generator does not have a STS agreement. 	<p>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>
8.	<p>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>No comment at this time. We are interested how it will work in practice.</p>
9.	<p>Please describe any concerns or agreement with proposed changes to Section 10 – Settlement and Payment Terms:</p>	<p>No comment at this time. We are interested how it will work in practice.</p>

Questions	Stakeholder Comments
<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>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 Revised to clarify commissioning for a load facility. 	No comment.
<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>	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>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 AESO’s proposed revisions to subsection 3.4(1)</p>	See response to Question 3.
<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,</p>	See response to Question 3.

Questions		Stakeholder Comments
	in light of the AESO's proposed revisions to subsection 3.2	
14	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	No comment.
15.	Additional comments	

Thank you for your input. Please email your completed matrix to: tariffdesign@aeso.ca

Stakeholder Comment Matrix – September 9, 2022

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



Comment period:	September 9, 2022, to October 7, 2022	Contact:	Scott Perry
Comments from:	Greengate Power Corporation	Email:	Scott@greengatepower.com
Date:	2022/10/07		

Instructions

1. Please fill out the section above as indicated.
2. Please respond to the questions below and provide your specific comments.
3. **Please submit one completed comment matrix per organization.**
4. **Stakeholder comment matrices will be published on aeso.ca, in their original state.**
5. Email your completed comment matrix to tariffdesign@aeso.ca by **Oct. 7, 2022**.

Purpose and intention

The AESO's forthcoming 2022 Tariff Modernization Application is intended to propose revisions to the terms and conditions of the ISO tariff to better align with, and to provide stakeholders with clarity regarding existing AESO practices and process regarding system access service requests. The application is also intended to propose a structural change to the compensation formula that exists for the provision of conscripted transmission must-run (TMR) service in Section 8 of the ISO tariff, *Ancillary Services*, so that generators can be compensated for emissions compliance costs associated with the provision of conscripted TMR service. The application is also intended to speak to outstanding directions issued by the Alberta Utilities Commission in Decision 22942-D02-2019 regarding the AESO's 2018 comprehensive ISO tariff application.

Request for feedback

The AESO is seeking comments from Stakeholders on the AESO's proposed application. Please be as specific as possible with your responses. Thank you.

Questions		Stakeholder Comments
1.	a) Is the purpose and objectives of the application clear? Please be specific.	a) 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.



Questions	Stakeholder Comments
<p>b) Are you aligned with the purpose and objectives of the application?</p> <p>c) Are the objectives and process for stakeholder engagement and AESO response clear?</p>	<p>b) 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>c) Most proposals' process is clear.</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 • New definition of “permit and licence” to be adopted into the CADG. 	<p>Greengate commented in the other stakeholder comment matrix.</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>As long as the AESO acts reasonably, Greengate is not concerned with the proposed changes.</p>

Questions	Stakeholder Comments
<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>4. 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>Greengate has no comments to this proposed change.</p>
<p>5. 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>Greengate supports the proposed changes to payments in lieu of notice which may make providing notice more economical for DTS customers.</p>

Questions	Stakeholder Comments
<p>6. 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>7. 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; Clarity regarding notification of GUOC and Clarity to address gaps when a generator does not have a STS agreement. 	<ul style="list-style-type: none"> “Issue – Refund of GUOC” (Slide 20 of presentation) <ul style="list-style-type: none"> 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 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. 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>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>Greengate has no comments to this proposed change.</p>

Questions	Stakeholder Comments
<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>Greengate has no comments to this proposed change.</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 • Revised to clarify commissioning for a load facility. 	<p>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>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>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>

	Questions	Stakeholder Comments
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 AESO's proposed revisions to subsection 3.4(1)	Greengate agrees with the AESO that long term costs is confusing and simplification is required.
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	As long as the AESO acts reasonably, Greengate can support the proposed changes.
14	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	Greengate has no comments to this proposed change.
15.	Additional comments	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.

Thank you for your input. Please email your completed matrix to: tariffdesign@aeso.ca

Stakeholder Comment Matrix – September 9, 2022

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



Comment period:	September 9, 2022, to October 7, 2022	Contact:	Ravinder Toor
Comments from:	Signalta Resources	Email:	ravi.toor@signalta.com
Date:	2022/10/07		

Instructions

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Purpose and intention

The AESO's forthcoming 2022 Tariff Modernization Application is intended to propose revisions to the terms and conditions of the ISO tariff to better align with, and to provide stakeholders with clarity regarding existing AESO practices and process regarding system access service requests. The application is also intended to propose a structural change to the compensation formula that exists for the provision of conscripted transmission must-run (TMR) service in Section 8 of the ISO tariff, *Ancillary Services*, so that generators can be compensated for emissions compliance costs associated with the provision of conscripted TMR service. The application is also intended to speak to outstanding directions issued by the Alberta Utilities Commission in Decision 22942-D02-2019 regarding the AESO's 2018 comprehensive ISO tariff application.

Request for feedback

The AESO is seeking comments from Stakeholders on the AESO's proposed application. Please be as specific as possible with your responses. Thank you.

Questions		Stakeholder Comments
1.	a) Is the purpose and objectives of the application clear? Please be specific. b) Are you aligned with the purpose and	See #15 below



Questions	Stakeholder Comments
<p>objectives of the application?</p> <p>c) Are the objectives and process for stakeholder engagement and AESO response clear?</p>	
<p>2.</p> <p>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 • New definition of “permit and licence” to be adopted into the CADG. 	
<p>3.</p> <p>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; • Repeated language from TPL reliability standards; • Repeated language for cost estimating for connection projects; 	

Questions	Stakeholder Comments
<ul style="list-style-type: none"> • 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>4. 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>5. 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>6. 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 	

	Questions	Stakeholder Comments
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; • Clarity regarding notification of GUOC • and • Clarity to address gaps when a generator does not have a STS agreement. 	
8.	<p>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. 	
9.	<p>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 	

	Questions	Stakeholder Comments
	<p>service, for the same market participant, within a substation.</p>	
10.	<p>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 Revised to clarify commissioning for a load facility. 	
11.	<p>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>	
12	<p>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 AESO’s proposed revisions to subsection 3.4(1)</p>	
13	<p>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>	
14	<p>Please describe any concerns or agreement with</p>	

	Questions	Stakeholder Comments
	the AESO's proposed approach to Direction 20 from AUC Decision 22942-D02-2019, regarding the costs of transmission line relocations	
15.	Additional comments	<p>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 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>

Thank you for your input. Please email your completed matrix to: tariffdesign@aeso.ca