

Stakeholder Comment Matrix – Feb. 6, 2020

Local Interconnection Costs for DFOs (Substation Fraction) and DFO Cost Flow-Through



<p>Period of Comment: Feb. 6, 2020 through Feb. 13, 2020</p> <p>Comments From: Canadian Solar Industries Association (CanSIA)</p> <p>Date: 2020-02-13</p>	<p>Contact: [REDACTED]</p> <p>Phone: [REDACTED]</p> <p>Email: [REDACTED]</p>
--	---

Instructions:

1. Please fill out the section above as indicated.
2. Please respond to the questions below and provide your specific comments.
3. Email your completed comment matrix to tariffdesign@aeso.ca by **Feb. 13, 2020**.

The AESO is seeking comments from Stakeholders with regard to the following matters:

	Questions	Stakeholder Comments
1.	Please comment on the proposed agenda	<p>CanSIA generally supports the proposed agenda. Presentations by DCGs and DFOs, rather than just the AESO, will help to ensure that all perspectives are heard at this initial stage of the process.</p> <p>CanSIA would recommend that an open forum be included following the level-setting presentations, to enable stakeholders to share their initial views on the content put forward by the AESO, DCGs and DFOs. 30 minutes would be sufficient for this section.</p> <p>We note that the proposed breakout session will exclude those participating by Webinar, and would therefore emphasise the importance that comments from the breakout groups are captured in the report back and understood by stakeholders not in that group.</p>
2.	Please comment on the proposed process and session overviews as indicated in the Letter of Notice	<p>The currently proposed timeline is unacceptable. This issue is causing significant investor uncertainty across the sector, to the extent that DCG projects are already being cancelled and delayed. A swift resolution must be reached lest investor confidence in the Alberta electricity market be permanently damaged. Our original</p>

		<p>R&V application was submitted in November 2019; Under the proposed timeline this issue is unlikely to be resolved until mid-2021.</p> <p>CanSIA advocates for an expedited Commission process once an application is filed; we recommend that 2 weeks between consultation sessions, rather than the AESO's proposal of more than a month. We note that this timeline was manageable during the capacity market consultation where there were five working group streams running concurrently and should be manageable now with a single topic of interest.</p>
3.	Additional comments	<p>CanSIA requests that additional details on Session 2 be released in advance of Session 1 to allow market participants to prepare. The current high level over-view notes "discuss and evaluate proposals for local interconnection costs for DFOs (Substation Fraction) and DFO cost flow-through." It is not clear at this point if this is intended to be AESO proposals for evaluation and commentary by market participants or if market participants will be able to submit proposals.</p> <p>CanSIA requests that the AESO accept market participant proposals. However, this direction requires communication on the part of the AESO fairly quickly. The AESO should receive and post market participant proposals a week in advance of Session 2 to provide stakeholders enough time to review other submissions and come prepared to Session 2. This timeline requires the AESO to communicate the solicitation of proposals and the deadline to stakeholders so they can work to develop their proposals.</p> <p>It would also be helpful to know if the AESO anticipates allowing stakeholders to present their proposals in Session 2. CanSIA suggests the ability to present a proposal and answer questions would be beneficial.</p> <p>CanSIA suggests depending on the number of proposal submissions received, that Session 2 may need to be a full day session and that the AESO should choose to schedule more time in Session 2 over the option of adding an additional session. Session 2 must achieve its objective of, at least, outlining and having an initial discussion on each alternative proposal.</p>

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