

Stakeholder Comment Matrix – June 10, 2020

DER Roadmap



Date of Request for Comment: <u>June 10, 2020</u>	Contact: <u>[REDACTED]</u>
Period of Consultation: <u>June 10, 2020</u> through <u>July 10, 2020</u>	Phone: _____
Comments From: <u>Lionstooth Energy</u>	Email: <u>[REDACTED]</u>
Date [yyyy/mm/dd]: <u>2020/07/10</u>	

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 stakeholderrelations@aeso.ca by **July 10, 2020**.

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

Question	Answer
Did you identify any content gaps in the <i>DER Roadmap</i> ? If yes, please explain.	<p>Lionstooth Energy (Lionstooth) appreciates the effort by the AESO in the development of the DER Roadmap and the clarity that this roadmap reflects the activities planned under the AESO’s current legislative mandate. We anticipate the outcome of the Distribution System Inquiry (DSI) as well as any other government-led policy developments will begin to bridge any significant gaps between the AESO’s mandate and other areas requiring attention. As such, and until there is further direction, Lionstooth supports the AESO focusing on their mandate and even stepping back from directing or leading change in areas outside of this mandate. There must be a measured and thoughtful pace to change in order to prevent unintended consequences and restore investor certainty, especially as it relates to DERs.</p> <p>In terms of specific comments on content in the DER Roadmap, Lionstooth offers the following:</p> <ul style="list-style-type: none"> • Gas-Fired DERs: Figure 1 illustrates a decentralized network, highlighting specifically solar and energy storage DERs. Missing from this figure, and unique to the Alberta market, is gas-fired DERs. The availability of gas resources throughout the province as well as the nature of Alberta’s industrial operations supports gas-fired DERs, either operating independently (merchant generation) or associated with a commercial / industrial operation (could include ISDs). The AESO’s DER Roadmap should be inclusive of all generation / fuel / technology types, especially including those with dispatchable capabilities which have an increased potential to create value as it relates to the integrated electric system.

	<ul style="list-style-type: none"> • Markets & FEOC: Generally, a focus on markets and FEOC looks to level the playing field, especially as it relates to DERs versus TCG. Lionstooth supports the AESO’s efforts to maintain a FEOC market and cautions that initiatives to promote parity must also consider the disparities that exist in our market today, especially for DERs. Generation developers take into consideration a broad range of elements when determining when and how to build new generation. Any focus on FEOC should ensure that developers have the ability and option to respond to market signals but recognize that the very nature of the generation may not qualify certain projects from providing or receiving certain benefits. FEOC does not require ALL playing fields to be leveled. For example, only renewable generators can earn offsets / credits, while still maintaining a FEOC market. • Signals & the Tariff: Lionstooth appreciates that there is a significant effort underway to evolve the ISO tariff. The AESO has acknowledged that the DER Roadmap reflects efforts under the AESO’s current mandate and that while the tariff is not directly applicable to DERs, alignment between Tx and Dx price signals should be pursued. Lionstooth is of the view that most open ISO tariff issues, as they relate to DERs have been addressed, or are in the process of being addressed and does not expect any further ISO tariff changes to directly focus on DERs. Lionstooth reiterates our support of the AESO stepping back from issues that are outside of the AESO’s mandate and notes that a measured and thoughtful pace to change, across the electricity value chain, is required to prevent unintended consequences and restore investor certainty, especially as it relates to DERs. • Legislation & Regulatory: Lionstooth supports this pillar of the DER Roadmap recognizing that policy confirmation and legislative change may be required as our electricity market evolves. Only the DOE can establish policy and if questions as to the efficacy or relevance of these policy directives are raised, we must first seek clarity from the DOE before pursuing or implementing any market changes, if needed. Lionstooth is interested in knowing the AESO’s view on what legislative and regulatory requirements may need to change to support DERs and notes that the timing of any such regulatory engagement is missing from the DER Roadmap actions. <p>It is vital that as our market evolves, through this DER Roadmap and other DER related initiatives, that the status quo be maintained until such time that any potential changes are clearly understood, their need confirmed, and the impact to stakeholders studied. We can no longer proceed down the path of making changes first, and then exploring their need and impacts, if investor certainty is to be restored.</p>
<p>Did you find value in the publication of the <i>DER Roadmap</i>? Would any additional information be helpful? How can it be improved?</p>	<p>Yes. Lionstooth found value in the DER Roadmap, especially as it relates to the AESO’s future vision of the Alberta electricity market and views on the value DERs can bring to the market.</p> <p>Additional information on how the AESO plans to improve system modeling and forecasting to accommodate DERs, especially in light of the upcoming LTO and LTP, would be beneficial. Lionstooth shares the AESO’s opinion that effective Tx and Dx system planning starts with data.</p>
<p>Do you have suggested changes to the activity timing in the <i>DER Roadmap</i> Integrated Plan? If yes, please be specific to why you would like to see the timing changed and what the suggested timing should look like.</p>	<p>Lionstooth supports prioritizing the timing of activities that would impact the LTO and LTP. As these documents are published every two years, we do not feel that our market is well served by waiting until 2023 to have improved integration of DERs into these planning documents. It is important that DERs are better accounted for in the 2021 LTO and LTP.</p>

	<p>The timing of other activities in the DER Roadmap should remain flexible to accommodate any outcomes from the DSI or guidance from future regulatory process, while also aligning with other Market Initiatives. A duplication of effort should be avoided and a balance to stakeholder engagement sought, to control against regulatory fatigue.</p>
<p>Are you aware of any recent DER research/ resources/ information that would provide the AESO more insight on this topic? If yes, please provide details or explain.</p>	<p>The AESO has a number of industry roundtables, learning forums, and working groups established for various subject areas, including a DER Working Group with the DFOs and DFO engagement through the Tx/Dx Planning Framework. There is however, no DER GFO involvement outside of standard industry engagement. Recent DER processes, such as the DSI and the Technical Sessions on the Substation Fraction issue, demonstrate that DER GFOs and developers have a strong voice and clear message to share with the market. Lionstooth would support the AESO expanding any DER Working Groups to include DER GFO leaders and / or establishing a forum for early engagement with DER GFO leaders.</p>