

## Stakeholder Comment Matrix – Sept. 24, 2020

### Bulk and Regional Tariff Design Session 2



<b>Period of Comment:</b> Sept. 24, 2020 through Oct. 8, 2020	<b>Contact:</b> Myles Fox
<b>Comments From:</b> Imperial Oil Resources	<b>Phone:</b> 587-476-4175
<b>Date:</b> 2020/10/08	<b>Email:</b> Myles.Fox@exxonmobil.com

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 evaluation per organization.**
4. Email your completed comment matrix to [tariffdesign@aeso.ca](mailto:tariffdesign@aeso.ca) by **Oct. 8, 2020**.

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

	Questions	Stakeholder Comments
1.	<p>Please comment on Session 2 hosted on Sept. 24, 2020. Was the session valuable? Was there something the AESO could have done to make the session more helpful?</p>	<p>Agree with IPCAA comments:</p> <ol style="list-style-type: none"> <li>1. Provide more time for technical questions, more information and billing examples supported with appropriate analysis / tools for bulk and regional cost recovery to illustrate impacts of the “bookend” options so customers can understand the impact of these AESO options on their bill.</li> <li>2. Schedule time directly after the relevant presentation material with specific customer segments to review the material &amp; impacts.</li> <li>3. Break up the session into half-day sections</li> <li>4. A separate session should be held for energy storage</li> </ol>
2.	<p>Are you supportive of the proposed engagement approach for the AESO’s Bulk and Regional Tariff Design? Why or why not? Please be as specific as possible.</p>	<p>The proposed approach is not sufficient for customers to understand a proposed tariff overhaul, justifications for the overhaul and impacts as being proposed by AESO.</p> <p>Of the Session 2 objectives, several were not met, including:</p> <ul style="list-style-type: none"> <li>• Review and gain acceptance on process and approach to complete a rate design</li> <li>• Reconfirm tariff rate design objectives and balance of trade-offs</li> <li>• Understand rate design bookends</li> <li>• Identify initial implications of rate design bookends</li> <li>• Provide technical clarity around rate design bookends</li> </ul> <p>Customers need more help and time to understand the impacts than what was provided in Session 2. It would be useful for the AESO to host customer-specific sessions for clarification and understanding.</p>

<p>3.</p>	<p>Do you support the AESO's perspective that 12-CP (status quo) is not a reasonable continued outcome of the Bulk and Regional Tariff Design? Please be as specific as possible.</p>	<p>The AESO has not provided any information to support the claim that the status quo is not a reasonable continued outcome especially since CP is a very common approach throughout North America.</p> <p>There is a lack of justification supporting the AESO perspective and the AESO should provide stakeholders with a clear understanding of:</p> <ul style="list-style-type: none"> <li>• Why changes are required at this time</li> <li>• What issues are driving the need for change</li> <li>• How we should quantify these issues</li> <li>• Will additional changes be required in short order when:             <ul style="list-style-type: none"> <li>○ The Transmission Regulation is re-examined by government</li> <li>○ The AUC makes any changes highlighted during the Distribution System Inquiry (such as aligning transmission and distribution rates)</li> <li>○ Changes are made regarding self-supply and export</li> <li>○ Sub-station fraction and DCG credit issues are resolved</li> </ul> </li> </ul>
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4.	<p>Are the AESO's bookends A and B reasonable starting points for the Bulk and Regional Tariff Design, considering future determination of modifications and mitigation? Why or why not? Please be as specific as possible.</p>	<p>The AESO's proposed "bookends" are simply narrow variations of the same approach used previously to move charges into a contract capacity billing determinant.</p> <p>In effect, the AESO has inappropriately limited its approach to increasing the importance of contract capacity to a greater or lesser degree combined with minor modifications to the real-time 12 CP billing determinant (more hours and regional peak rather than 12 CP). This is not an examination of potential bookends.</p>
5.	<p>Are their considerations or objectives relating to energy storage tariff treatment that you feel the AESO has missed? If yes, please describe and be as specific as possible.</p> <p>Do you have additional clarifying questions that need to be answered to support your understanding?</p>	<p>No comments at this time.</p>
6.	<p>Additional comments</p>	<p>The AESO should not rush through this consultation in a handful of consultation sessions for filing with the Commission in Q1 2020. Instead, the AESO if it wishes to proceed should establish a longer consultation process that allows adequate time for complex analysis of proposed alternatives by market participants. This may result in a delay of the regulatory filing, but by the AESO's own analysis, the proposed changes could impact a subset of customers by over \$100M per year. A change of this magnitude must be carefully considered and unintended consequences must be contemplated to avoid further disruption.</p>

Thank you for your input. Please email your comments to: [tariffdesign@aeso.ca](mailto:tariffdesign@aeso.ca).