

Stakeholder Comment Matrix – Sept. 24, 2020

Bulk and Regional Tariff Design Session 2



Period of Comment: Sept. 24, 2020 through Oct. 8, 2020	Contact: Myles Fox
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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 by **Oct. 8, 2020**.

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

	Questions	Stakeholder Comments
1.	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>Agree with IPCAA comments:</p> <ol style="list-style-type: none"> 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. 2. Schedule time directly after the relevant presentation material with specific customer segments to review the material & impacts. 3. Break up the session into half-day sections 4. A separate session should be held for energy storage
2.	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>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"> • Review and gain acceptance on process and approach to complete a rate design • Reconfirm tariff rate design objectives and balance of trade-offs • Understand rate design bookends • Identify initial implications of rate design bookends • Provide technical clarity around rate design bookends <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"> • Why changes are required at this time • What issues are driving the need for change • How we should quantify these issues • Will additional changes be required in short order when: <ul style="list-style-type: none"> ○ The Transmission Regulation is re-examined by government ○ The AUC makes any changes highlighted during the Distribution System Inquiry (such as aligning transmission and distribution rates) ○ Changes are made regarding self-supply and export ○ Sub-station fraction and DCG credit issues are resolved
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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.