

Stakeholder Comment Matrix – Sept. 14, 2020

Request for Feedback on 2020-2021 Plan for ISO Tariff-Related Activities



Period of Comment: Sept. 14, 2020 through Oct. 6, 2020 Comments From: Lionstooth Energy Date: 2020/10/06	Contact: Erika Goddard Phone: Email: erika.goddard@lionstoothenergy.com
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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 matrix per organization.**
4. Email your completed comment matrix to tariffdesign@aeso.ca by **Oct. 6, 2020**.

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

	Questions	Stakeholder Comments
1.	Is the publication of the <i>2020-2021 Plan for ISO Tariff-Related Activities</i> (“2020-2021 Plan”) useful to you? Would any additional information be helpful? Please be specific.	<p>Lionstooth found the publication of the Tariff-Related Activities plan useful, as well as the other plans / roadmaps that the AESO has published this year. We appreciate the opportunity to provide comment and review the AESO’s feedback on those comments.</p> <p>Recognizing that Tariff-Related Activities will evolve over time, and may be influenced by other processes, such as the outcome of the Distribution System Inquiry (DSI), it would be beneficial for updates to the Tariff-Related Activities plan, and others, to be published as frequently as able to keep stakeholders informed.</p>
2.	Are there any additional tariff-related activities that in your view require the AESO’s and stakeholders’ attention in 2021 that are not listed in the 2020-2021 Plan?	<p>As the AESO looks to advance individual components / phases of the tariff, it is important that engagement and consultation with stakeholders include quantitative analysis to justify the need for change, provide analytical support explaining the change, and demonstrate the impact to stakeholders. This analysis should also include an iterative round where the impact of these proposed changes is “mapped out” to model future behaviors as a result of a change to the ISO tariff. This will provide an indication if the tariff price signal is effective for both stakeholders and system planners.</p> <p>By presenting this analysis, early and often during the Development phase, increased transparency and understanding of the need, method, and impacts of</p>

		<p>change can be better understood. Previous stakeholder engagements and technical sessions have lacked this quantitative step, resulting in fundamental differences of opinion, from the start. This can make AESO-led engagement less effective and can even result in these issues being raised in front of the Commission, further delaying the Regulatory process.</p>
3.	<p>Do you have suggested changes to the timing of activities in the 2020-2021 Plan schedule? 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 would support a longer Development timeline for these complex ISO tariff issues, specifically more engagement and consultation with stakeholders. While we recognize that not all parties can be satisfied, we firmly believe that more alignment on ISO tariff related matters before filing with the Commission would lead to a more effective and efficient Regulatory phase.</p> <p>The proposed quantitative analysis highlighted above allows for fact-based, rather than opinion-based, discussion on proposed tariff changes – how they impact customers and how customers will respond. Without this, the proposed timelines are very optimistic, and will likely result in continued contentious regulatory proceedings.</p> <p>Further, recognizing that plans change, especially during these current circumstances, Lionstooth does not believe that seemingly arbitrary deadlines should dictate the path forward. There should be flexibility, so that if more engagement and consultation during the Development phase would benefit the process, this could be accommodated.</p> <p>In terms of the schedule as outlined, while the ISO tariff is proceeding in phases, all of the phases essentially overlap each other, with all four in front of the Commission at the same time. Instead of addressing multiple significant issues in a single application, now multiple significant issues would be addressed in multiple proceedings, at the same time. Perhaps it would be better to stagger some of the phases more, so that progress on the previous phase can be achieved, before introducing a new concept. A more staggered approach would support a measured and thoughtful pace to change.</p>
4.	<p>Do you have any other suggestions or comments you would like to share with the AESO related to the 2020-2021 Plan?</p>	<p>As the ISO tariff is intended to provide efficient signals that influence behaviors and planning, it is important to coordinate the impact of future tariff changes with system planning, and vice versa. We understand the AESO's long-term outlook and plan will be published next year. It will be important to capture in these long-term plans, the impact of any ISO tariff changes and likely customer response, as indicated by during Development engagement and consultation.</p>

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