

## Stakeholder Comment Matrix – Feb 25, 2020

### Request for feedback on sub-hourly settlement, session 1 material



<b>Period of Comment:</b> Feb. 25, 2020 through Mar. 13, 2020 <b>Comments From:</b> Rodan Energy Solutions <b>Date:</b> [2020/03/13]	<b>Contact:</b> ██████████ <b>Phone:</b> ██████████ <b>Email:</b>
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The AESO is seeking comments from stakeholders on its approach to reviewing sub-hourly settlement, and content from Session 1.

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 matrix to [stakeholder.relations@aeso.ca](mailto:stakeholder.relations@aeso.ca) by Mar. 13, 2020
4. Stakeholder comments will be published to [aeso.ca](http://aeso.ca), in their original state, with personal or commercially sensitive information redacted, following Mar. 13, 2020.

	Questions	Stakeholder Comments
1.	Please describe why you are interested in sub-hourly settlement and how it affects your business.	Rodan Energy Solutions provide MSP and MDM services to most of the suppliers in Alberta. Rodan is a trusted and experienced service provider and is fully capable of managing the reprogramming, resealing and installation of most of the meters utilized in Alberta for settlement purposes.
2.	Is your organization a load, supplier, both a load and supplier, a billing agent, or other. If other, please describe.	We are a service provider. We provide MSP and MDM Services to most of the suppliers in Alberta
3.	The AESO has described the scope for this process, general agenda items and timing for upcoming stakeholder engagements. Please describe if you believe the scope is appropriate. If not, please describe/provide your rationale.	Rodan agrees with the Scope and Agenda.
4.	At the session, the AESO outlined the objectives of the sub-hourly settlement, which was to improve price fidelity and incent flexibility. Do you have any comments on the objectives of the	Rodan fully supports the objectives of the engagement.

	Questions	Stakeholder Comments
	sub-hourly settlement engagement?	
5.	<p>Are there considerations other than the following that should be taken into account to determine the value in moving to sub-hourly settlement interval?</p> <ul style="list-style-type: none"> <li>• The expected enhancement in price fidelity and flexibility</li> <li>• The expected financial impact on loads and generators</li> <li>• Implementation costs for the AESO and market participants</li> <li>• Timing required to transition to a sub-hourly settlement interval</li> </ul>	<p>Moving to sub-hourly settlement (5-minute) would allow for more detailed demand calculations, which could incentivise some consumers to be more mindful of their overall consumption patterns. Increased data resolution would, in turn, allow for a better balance of grid supply to market demand. This could also lend itself well to demand-side management initiatives, and perhaps other conservation programs.</p>
6.	Please describe the size of your business in the approximate total MWhs consumed or produced in 2019.	NA
7.	<p>Do you currently have interval metering installed in your operations?</p> <p>If yes, please describe the approximate volume of your business that was measured using interval meters in 2019.</p>	NA
8.	<p>Can you identify which of the following elements will be affected by the implementation of sub-hourly settlements at <b>five-minute intervals</b>?</p> <ul style="list-style-type: none"> <li>• Metering</li> <li>• IT systems</li> <li>• Data storage</li> <li>• Other</li> </ul>	<p>In Rodan's view, the metering, IT Systems and Data storage.</p>
9.	For each of the elements listed in question 8 above, please describe the changes that would be required for your business.	<p>Metering – Rodan Energy has a large number of customers whose meters will require reprogramming to meet the needs of sub-hourly settlement.</p> <p>IT Systems – There will be an increase in the data that Rodan would manage for its</p>

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		<p>customers. Our IT Systems will be fully capable to meet the increased demand.</p> <p>Data Storage – Currently, data is stored using 15-minute intervals. Data storage capacity will need to be increased if sub hourly settlement migrates to 5-minute intervals. Rodan’s data storage capacity can be easily increased in a cost-effective manner.</p>
10.	<p>The AESO is looking to understand the magnitude of costs during this initial phase. For each of the elements listed in question 8 above, please provide estimates of the cost required to implement these changes. If you are unable to provide cost estimates, please indicate when you can do so.</p>	<p>The magnitude of costs for customers will vary greatly depending on the metering and IT systems currently used by each customer. Rodan will continue to consult with the AESO and customers on an implementation plan. Rodan has already completed some initial analysis on the best approach to implement these changes and has consulted with the AESO on this approach.</p> <p>Most meters in use in Alberta have the ability to provide 5-minute interval data. However, they are currently programmed and sealed to provide 15-minute interval data. As a result, these meters would need to be re-programmed and re-sealed. Based on our considerable experience, the best approach to complete this work is to use a common meter pool. Rodan would program and seal meters, take the newly programmed meters out to a customer site and swap out the old meter for the newly programmed meter. The swapped out meter would be reprogrammed and sealed for the next customer site.</p> <p>There are some instances where the existing meters do not have the 5-minute interval capability. These meters would be replaced with new meters. This is an easier process than above but could be more expensive.</p>
11.	<p>For each of the elements listed in question 8 above, please describe the timing required to implement these changes.</p>	<p>We recommend a phase in period to for customers to become compliant. The most efficient implementation plan would be to follow the re-seal schedule for all meters in the field. Every meter has a re-seal period, by which it needs to be tested and resealed. If this schedule is followed, the meters can be re-programmed for 5 minute interval data at the time of their scheduled resealing. This process could take up to six years to fully implement.</p>

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12.	<p>Can you identify which of the following elements will be affected by the implementation of sub-hourly settlements at <b>15-minute intervals</b>?</p> <ul style="list-style-type: none"> <li>• Metering</li> <li>• IT systems</li> <li>• Data storage</li> <li>• Other</li> </ul>	<p>Rodan already provides all data on a 15 minute interval as this is how all meters in the field are currently programmed.</p>
13.	<p>For each of the elements listed in question 12 above, please describe changes that would be required for your business.</p>	<p>No impact</p>
14.	<p>The AESO is looking to understand the magnitude of costs during this initial phase. For each of the elements listed in question 12 above, please provide estimates of the cost required to implement these changes. If you are unable to provide cost estimates by the end of the comment period (March 13, 2020), please indicate when you can do so.</p>	<p>No impact</p>
15.	<p>For each of the elements listed in question 12 above, please describe the timing required to implement these changes.</p>	<p>No impact</p>
16.	<p>The AESO has described some challenges that may impact market participants. Are there other challenges that have not been identified that are unique to the market participant or in general?</p>	<p>No additional challenges</p>
17.	<p>Should sub-hourly settlement apply to all market participants? Is it fair for sub-hourly settlement to only apply to a subset of market participants?</p>	<p>It is Rodan's opinion that sub-hourly settlement should apply to all market participants</p>

	Questions	Stakeholder Comments
18.	<p>Does payment to suppliers on the margin (PSM) sufficiently incent generator response without sub-hourly settlement?</p> <p>If we move to sub-hourly settlement, is PSM still required to address the mismatch between settlement and dispatch interval?</p>	No comment
19.	<p>Are there any other benefits that have not been identified? Please elaborate.</p>	No comment
20.	<p>Is the approach used for this engagement effective?</p> <p>If no, please provide specific feedback on how the AESO can make these sessions more constructive.</p>	Yes
21.	<p>The AESO seeks to be transparent through this stakeholder engagement process and would like to publish all information as received.</p> <p>Is the information provided in this feedback suitable to be published by the AESO on aes0.ca? If no, please indicate the sections of your response that should be redacted?</p>	Yes
22.	<p>Please provide any other comments you have related to the sub-hourly settlement engagement.</p>	<p>Rodan supports sub-hourly settlement and believes that all market participants should participate.</p> <p>Rodan will work with the AESO to implement the most efficient plan to ensure all suppliers meet the requirements of sub-hourly settlement. This will involve a meter pool plan, where meters are programmed and sealed in advance and swapped out. This will ensure there is no downtime during the implementation period for suppliers.</p> <p>Rodan believes that this plan should work for most of the suppliers in the province of Alberta.</p>

Thank you for your input. Please email your comments to: [stakeholder.relations@aes0.ca](mailto:stakeholder.relations@aes0.ca).