

# 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> Colin Thompson
<b>Comments From:</b> Signalta Resources Limited	<b>Phone:</b> 403-875-6182
<b>Date:</b> [2020/10/08]	<b>Email:</b> colin.thompson@signalta.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.	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?	
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.	- Signalta is supportive of the proposed engagement approach only if industry's comments and push back are seriously taken into consideration by AESO.

<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>	<ul style="list-style-type: none"> <li>- Signalta is not in support of AESO's perspective on this matter. Signalta does not agree that the 12-CP is an unreasonable continued outcome of the Bulk and Regional Tariff Design. The 12-CP is a stable and reasoned approach to address congestion on the Alberta grid. It gives reasonable opportunity for load to avoid and it give reasonable opportunity for generation to respond. But it is also not possible to predict perfectly and only rewards those that are highly sophisticated and active in addressing the underlying objective of the program.</li> <li>- Instituting reform of the nature and extreme prosed by AESO would be detrimental to our industry that has already made significant investments and developed projects based on the existing tariff design or an expectation that whole sale and under-justified changes are not to be expected. Future investment in Alberta and in behind-the-fence generation will continue to be severely hampered by AESO's pursuit of such significant changes without substantial proof of need and efficacy. Given the long term investments made and risks developers of all sizes take in this industry, it is inappropriate and harmful for the AESO to be shifting around substantial economic structures without a very high burden of proof of costs and benefits.</li> <li>- Industry participants including ourselves make economic decisions based on the existing framework and assumptions of reasoned regulatory evolution. Returns in this industry are not substantial and regulatory changes/risks have to be appropriate and well substantiated to attract capital. Otherwise, capital has and will continue to migrate elsewhere. If our regulatory framework changes and continues to change as AESO has actively been proposing (capacity market, fractioning, line loss allocations, feeder level DG allocations, etc.), future project development and recovery will continue to be stunted. Ultimately such approaches are corrosive to Alberta's economy.</li> </ul>
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	Questions	Stakeholder Comments
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>	
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>	
6.	<p>Additional comments</p>	

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