

Stakeholder Comment Matrix – June 25, 2020

Participant-Related Costs for DFOs (Substation Fraction) and DFO Cost Flow-Through
Technical Session 3



Period of Comment: June 25, 2020 through July 17, 2020	Contact: [REDACTED]
Comments From: ENMAX Power Corporation	Phone: [REDACTED]
Date: 2020/07/17	Email: [REDACTED]

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 **July 17, 2020**.

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

	Questions	Stakeholder Comments
1.	Please comment on Technical Session 3 hosted on June 25, 2020. Was the session valuable? Was there something the AESO could have done to make the session more helpful?	The session was required as the AESO has proposed changes to its previous proposal(s).
2.	Please comment on your level of support for the AESO's revised proposal and the level to which AESO's revised proposal supports the principles (as developed through this stakeholder engagement). Please be as specific as possible.	EPC does not support the revised AESO proposal which require the DFO be responsible for all of the costs, calculations and allocations. In particular, it is not clear that EPC would have the ability to allocate and assign costs between loads and generators. EPC does not support the removal of a DCG charge from the ISO tariff. EPC does not support the removal of provisions requiring the AESO to determine supply and demand-related amounts.
3.	Please comment on any outstanding risks or issues you see with the AESO's revised proposal. Please be as specific as possible.	Under the AESO's previous proposal, there was going to be either a) a standard \$/MW charge DCG customers would be charged, or b) a standard methodology using localized \$/MW charges at the POD. Under the new proposal there appears to be a loss in standardization and it appears that each DCG customer will be subject to unique charges on a case-by-case and/or DFO-by-DFO basis potentially leading to rate shopping. EPC anticipates that this approach will also add increased regulatory burden to DFO tariff applications.
4.	Please provide any further comments you may have on next steps regarding regulatory process and implementation. Please be as specific as possible.	<p>Stakeholders should be provided with adequate time to understand the new proposals being contemplated by the AESO and a reasonable opportunity to provide feedback. Until adequate stakeholder consultation is held on the matter, the AESO should not move forward with submitting to the AUC any changes regarding Participant-Related Costs for DFOs and DFO Cost Flow-through.</p> <p>EPC understands that the Commission has recently issued a letter on July 13, 2020 in Proceeding 25101 where it advised that the AESO's substation fraction technical meeting proposal should be addressed as part of the Phase 2 Module for the ISO Tariff Contribution Policy.</p>

5.	Additional comments	<p>On Slide 28, the AESO states “Reaching parity and determining appropriate cost is valuable in principle; however relative to other ISO tariff incentives and costs being investigated within the industry at this time, this charge is of smaller importance to the overall system.”</p> <p>EPC would like to better understand this statement, as it appears to run contrary to the original reason the substation fractioning methodology was introduced, which was to address parity between the transmission and distribution system.</p>
----	---------------------	--

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