

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: The Office of The Utilities Consumer Advocate	Phone: [REDACTED]
Date: [2020/07/08]	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 UCA was expecting an outcome from Technical Session 3 that was more in line with the discussions held in previous sessions. The outcomes of stakeholder engagement activities should be consistent with the discussions held during the consultation process to avoid becoming just a formal step.
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.	<p>Given that the revised AESO proposal recommends the DCG charge be administered under the DFO Tariff, the UCA does not believe that the AESO's proposal achieves the intent of Principle 1- parity between transmission connected and distribution connected generation facilities.</p> <p>The UCA considers any proposal should give most relevance to principles of consistency and fairness with no economic advantage to be found from connecting at D vs T voltage levels.</p>
3.	Please comment on any outstanding risks or issues you see with the AESO's revised proposal. Please be as specific as possible.	<p>The AESO is suggesting the AUC allow it to remove ISO Tariff provisions requiring the AESO to determine supply/demand related amounts. This would remove the AESO from having to determine and calculate the appropriate \$/MW system contribution charge and instead leave the determination of a DCG charge up to the DFOs. The AESO has a public interest mandate and leaving the appropriate allocation up to the DFOs may not result in a fair outcome for load customers.</p> <p>The CCD contributions paid for by DCGs since 2015 will be collected from TFOs and returned to DFOs and subsequently the DCGs. As a result, the shortfall in investment will consequently be collected from load at a time when consumers are suffering from the economic consequences of the pandemic. The UCA seeks clarity as to how the AESO plans to minimize the impact of this collection on residential, small commercial and farm consumers.</p>
4.	Please provide any further comments you may have on next steps regarding regulatory process and implementation. Please be as specific as possible.	The UCA is interested in knowing whether the AESO plans to closely monitor these DFO charges.
5.	Additional comments	

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