

November 5, 2021

To: The Market Surveillance Administrator, market participants and other interested parties
("Stakeholders")

Re: **Stakeholder Comments on Letter of Notice of the following:**

- 1) **Proposed Adjusted Metering Practice Implementation; and**
- 2) **Proposed Amendments to Section 502.10 of the ISO rules, Revenue Metering System Technical and Operating Requirements ("Section 502.10")**

Pursuant to Alberta Utilities Commission Rule 017, *Procedures and Process for Development of ISO Rules and Filing of ISO Rules with the Alberta Utilities Commission*, written comments received from the Stakeholders in response to the Alberta Electric System Operator's ("AESO") October 14, 2021 Letter of Notice regarding Proposed Adjusted Metering Practice Implementation and Proposed Amendments to Section 502.10 have been posted on the AESO website. Comments were received from the following Stakeholders:

- AltaLink Management Ltd.
- ATCO Ltd.
- ENMAX Power Corporation
- EPCOR Distribution and Transmission Inc.
- DCG Consortium
- Kalina Distributed Power
- Lionstooth Energy Inc.
- Signalta Resources Limited

The written Stakeholder comments can be found on the Stakeholder engagement page on the AESO website at www.aeso.ca. Follow the path Stakeholder Engagement > Rules, standards and tariff consultations > Proposed Adjusted Metering Practice Implementation and Proposed Amendments to Section 502.10 of the ISO rules, Revenue Metering System Technical and Operating Requirements

Thank you to all Stakeholders who participated in this ISO rules comment process. All written comments received will be considered in the AESO's finalization of the Proposed Adjusted Metering Practice Implementation and Proposed Amendments to Section 502.10 and responses to those comments will be posted on the AESO website.

If you have any questions, please submit them to rules_comments@aeso.ca

Sincerely,

Jodi Marshall

Legal Manager, ISO Rules and Alberta Reliability Standards
Legal and Regulatory Affairs
rules_comments@aeso.ca

Stakeholder Comment Matrix for the following:

1) Proposed Adjusted Metering Practice Implementation; and

2) Proposed Amendments to Section 502.10 of the ISO rules, Revenue Metering System Technical and Operating Requirements (“Section 502.10”)



Period of Comment: October 14, 2021 through November 4, 2021

Comments From: AltaLink Management Ltd. (AML)

Date: October 29, 2021

Contact: Jenette Yearsley

Phone: 403-387-8275

Email: Jenette.Yearsley@AltaLink.ca

Instructions:

1. Please fill out the section above as indicated.
2. Please refer back to the “related material” on the Stakeholder Engagement page on the AESO website.
3. Please respond to the questions below and provide your specific comments, if any. Blank boxes will be interpreted as favorable comments.

Stakeholder Comment Matrix for the following:

1) Proposed Adjusted Metering Practice Implementation; and

2) Proposed Amendments to Section 502.10 of the ISO rules, Revenue Metering System Technical and Operating Requirements (“Section 502.10”)



The AESO is seeking comments from Stakeholders on the development of proposed Amendments to Section 502.10 – regarding the following matters:

	Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
1.	Do you agree that the issue identified in the letter of notice requires the development of proposed amended Section 502.10? If not, why not?	AltaLink agrees.
2.	Do you agree with the potential purpose of development of proposed amended Section 502.10? If not, why not?	AltaLink agrees.
3.	Do you agree with the proposed consultation and timelines? If not, why not?	AltaLink agrees.
4.	Do you agree that the proposed amendments to Section 502.10 are not technically deficient? If not, why?	AltaLink agrees.
5.	Do you agree that the proposed amendments to Section 502.10, taken together with all ISO rules, support a fair, efficient, and openly competitive market? If not, why?	AltaLink agrees.
6.	Do you agree that the proposed amendments to Section 502.10 support the public interest? If not, why?	AltaLink agrees.
7.	Please provide any comments or views on the need for the development of a related information document, including the type of content that should be included.	None.
8.	If approved, the AESO will propose an effective date of April 1, 2022. Do you agree? If not, why?	AltaLink agrees
9.	Do you have any additional comments regarding the proposed amendments to Section 502.10?	None.

Stakeholder Comment Matrix for the following:

1) Proposed Adjusted Metering Practice Implementation; and

2) Proposed Amendments to Section 502.10 of the ISO rules, Revenue Metering System Technical and Operating Requirements (“Section 502.10”)



The AESO is seeking comments from Stakeholders on the implementation of the Adjusted Metering Practice– regarding the following matters:

	AMP Implementation Plan	Stakeholder Comments and/or Alternate Proposal
10.	Do you have any comments on the <i>Adjusted Metering Practice Implementation Plan</i> ?	None.
11.	Do you have comments in regard to the proposed treatment of costs for installing new revenue meters as outlined in the <i>Adjusted Metering Practice Implementation Plan – Background Information</i> document?	None.

Stakeholder Comment Matrix for the following:

1) Proposed Adjusted Metering Practice Implementation; and

2) Proposed Amendments to Section 502.10 of the ISO rules, Revenue Metering System Technical and Operating Requirements (“Section 502.10”)



Period of Comment: October 14, 2021 through November 4, 2021	Contact: Nathan Coutu
Comments From: ATCO	Phone: 403-741-8933
Date: [2021/10/29]	Email: nathan.coutu@atco.com

Instructions:

1. Please fill out the section above as indicated.
2. Please refer back to the “related material” on the Stakeholder Engagement page on the AESO website.
3. Please respond to the questions below and provide your specific comments, if any. Blank boxes will be interpreted as favorable comments.

Stakeholder Comment Matrix for the following:

1) Proposed Adjusted Metering Practice Implementation; and

2) Proposed Amendments to Section 502.10 of the ISO rules, *Revenue Metering System Technical and Operating Requirements* (“Section 502.10”)



The AESO is seeking comments from Stakeholders on the development of proposed Amendments to Section 502.10 – regarding the following matters:

Stakeholder Comment Matrix for the following:

1) Proposed Adjusted Metering Practice Implementation; and

2) Proposed Amendments to Section 502.10 of the ISO rules, Revenue Metering System Technical and Operating Requirements (“Section 502.10”)



	Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
1.	Do you agree that the issue identified in the letter of notice requires the development of proposed amended Section 502.10? If not, why not?	Yes, no issue's.
2.	Do you agree with the potential purpose of development of proposed amended Section 502.10? If not, why not?	Yes, we agree.
3.	Do you agree with the proposed consultation and timelines? If not, why not?	<i>Yes, we agree in principle that the AUC approves.</i>
4.	Do you agree that the proposed amendments to Section 502.10 are not technically deficient? If not, why?	Yes, we agree. Additional suggestions to section 4: 4(A) The Transmission Facility (Replace Substation) is connected to an electric distribution system 4(c) the legal owner installs or replaces a complete switchgear lineup connected to the bus except in an emergency situation.
5.	Do you agree that the proposed amendments to Section 502.10, taken together with all ISO rules, support a fair, efficient, and openly competitive market? If not, why?	<i>No comment.</i>
6.	Do you agree that the proposed amendments to Section 502.10 support the public interest? If not, why?	<i>No comment</i>
7.	Please provide any comments or views on the need for the development of a related information document, including the type of content that should be included.	<i>An AMP Information document would be useful.</i>

Stakeholder Comment Matrix for the following:

1) Proposed Adjusted Metering Practice Implementation; and

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	Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
8.	If approved, the AESO will propose an effective date of April 1, 2022. Do you agree? If not, why?	<i>Yes, we agree.</i>
9.	Do you have any additional comments regarding the proposed amendments to Section 502.10?	<i>No additional comments.</i>

The AESO is seeking comments from Stakeholders on the implementation of the Adjusted Metering Practice– regarding the following matters:

	AMP Implementation Plan	Stakeholder Comments and/or Alternate Proposal
10.	Do you have any comments on the <i>Adjusted Metering Practice Implementation Plan</i> ?	Previously provided comments.
11.	Do you have comments in regard to the proposed treatment of costs for installing new revenue meters as outlined in the <i>Adjusted Metering Practice Implementation Plan – Background Information</i> document?	<i>No comment</i>

Stakeholder Comment Matrix for the following:

1) Proposed Adjusted Metering Practice Implementation; and

2) Proposed Amendments to Section 502.10 of the ISO rules, Revenue Metering System Technical and Operating Requirements (“Section 502.10”)



<p>Period of Comment: October 14, 2021 through November 4, 2021</p> <p>Comments From: DCG Consortium</p> <p>The DCG Consortium is comprised of the following members: BluEarth Renewables Inc., Elemental Energy Renewables Inc., and RWE Renewables Canada Holding Inc. This submission represents the consensus view of the group and is submitted on behalf of the group by Power Advisory LLC</p> <p>Date: 2021/11/04</p>	<p>Contact: Christine Runge (Power Advisory)</p> <p>Phone: 403-613-7624</p> <p>Email: crunge@poweradvisoryllc.com</p>
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Stakeholder Comment Matrix for the following:

1) Proposed Adjusted Metering Practice Implementation; and

2) Proposed Amendments to Section 502.10 of the ISO rules, Revenue Metering System Technical and Operating Requirements (“Section 502.10”)



The AESO is seeking comments from Stakeholders on the development of proposed Amendments to Section 502.10 – regarding the following matters:

	Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
1.	Do you agree that the issue identified in the letter of notice requires the development of proposed amended Section 502.10? If not, why not?	
2.	Do you agree with the potential purpose of development of proposed amended Section 502.10? If not, why not?	
3.	Do you agree with the proposed consultation and timelines? If not, why not?	
4.	Do you agree that the proposed amendments to Section 502.10 are not technically deficient? If not, why?	
5.	Do you agree that the proposed amendments to Section 502.10, taken together with all ISO rules, support a fair, efficient, and openly competitive market? If not, why?	
6.	Do you agree that the proposed amendments to Section 502.10 support the public interest? If not, why?	
7.	Please provide any comments or views on the need for the development of a related information document, including the type of content that should be included.	
8.	If approved, the AESO will propose an effective date of April 1, 2022. Do you agree? If not, why?	
9.	Do you have any additional comments regarding the proposed amendments to Section 502.10?	

Stakeholder Comment Matrix for the following:

1) Proposed Adjusted Metering Practice Implementation; and

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The AESO is seeking comments from Stakeholders on the implementation of the Adjusted Metering Practice– regarding the following matters:

	AMP Implementation Plan	Stakeholder Comments and/or Alternate Proposal
10.	Do you have any comments on the <i>Adjusted Metering Practice Implementation Plan</i> ?	<p>The AESO notes that there are 85 DFO substations with DCGs downstream. 75 of these have feeder level revenue class meters and 10 do not. As a result, under the AESO proposal, DCGs connected to 75 substations are part of Category B and will be metered at the feeder level for the purposes of DCG Credits effective July 1, 2022, while DCGs connected to the remaining 10 substations will continue to be metered at the substation level for DCG Credit calculation purposes for months or years after July 1, 2022.</p> <p>The AESO notes that it will work with TFOs to develop a master schedule for the Category C substations, but that it currently expects only one or two substations will be upgraded in each service territory each year. Per the AESO’s consultation schedule, the AESO has committed to respond to stakeholder comments on November 25. The DCG Consortium requests that the AESO break down these 10 substations into the number of substations in each of ENMAX, EPCOR, Red Deer and Lethbridge service territories. Without this breakdown, the DCG Consortium assumes the AESO expects Category C to take between two and ten years to complete.</p> <p>Even on the low end of two years, this discriminates and creates a concerning unfairness between DCGs that will transition to the adjusted metering practice in Category B on July 1, 2022, and DCGs that will transition to the adjusted metering practice in Category C at some point over the next several years. In addition, this is also concerning as it relates to the timing of the first DCG to transition to the adjusted metering practice in Category C and the last DCG to transition to the adjusted metering practice in Category C.</p> <p>The DCG Consortium suggests that the effective date of the adjusted metering practice at all substations should be the month after the final Category C substation is equipped with the required metering infrastructure, MDPR, and SAS agreement. Anything other than this would be unfair and create an unlevel playing field among similarly situated DCGs. In particular, the DCG Consortium submits that this would result in discriminatory tariff treatment as between market participants.</p>

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11.	Do you have comments in regard to the proposed treatment of costs for installing new revenue meters as outlined in the <i>Adjusted Metering Practice Implementation Plan – Background Information</i> document?	<p>The DCG Consortium does not have any issue with costs of meter infrastructure for Category C substations being collected through the TFO rate base. The DCG Consortium also does not have any issue with costs of future projects being allocated to DFOs via CCDs.</p> <p>However, the AESO notes that “To the extent possible, the allocation of costs (and flow through of AESO contributions) should send a signal to end-customers, including DCG, about the costs to connect.” This language should not form a part of the AESO’s application to the Commission.</p> <p>This suggestion is out of scope for the adjusted metering practice implementation proceeding and including it will reduce regulatory efficiency as the DCG Consortium, and likely other parties, will want to challenge and fully explore the meaning and intent of this statement, and what it means for DCGs.</p> <p>The AESO itself admits that “The manner and quantum of participant costs that DFOs flow through to DCGs is a matter best addressed in the DFO’s tariff.” This will not be a DFO tariff proceeding.</p> <p>The DCG Consortium would further note that the Commission already ruled on this matter in Decision 25848-D01-2020 by setting the substation fraction equal to one at DFO substations. This decision cannot be reviewed by the Commission in the adjusted metering practice implementation proceeding.</p>
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<p>Period of Comment: October 14, 2021 through November 4, 2021</p> <p>Comments From: ENMAX Power Corporation</p> <p>Date: 2021/11/04</p>	<p>Contact: Mark McGillivray</p> <p>Phone:</p> <p>Email: MMcGillivray@enmax.com</p>
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1. Please fill out the section above as indicated.
2. Please refer back to the “related material” on the Stakeholder Engagement page on the AESO website.
3. Please respond to the questions below and provide your specific comments, if any. Blank boxes will be interpreted as favourable comments.

The AESO is seeking comments from Stakeholders on the development of proposed Amendments to Section 502.10 – regarding the following matters:

	Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
1.	Do you agree that the issue identified in the letter of notice requires the development of proposed amended Section 502.10? If not, why not?	Agree.
2.	Do you agree with the potential purpose of development of proposed amended Section 502.10? If not, why not?	Agree.
3.	Do you agree with the proposed consultation and timelines? If not, why not?	The proposal to submit an application to the AUC to approve the proposed amended Section 502.10 and AMP implementation plan appear reasonable as long as stakeholder comments have been addressed prior to this. As noted in our response to Question 10, EPC is waiting for follow-up on a number of questions and concerns which were submitted to the AESO on September 29.
4.	Do you agree that the proposed amendments to Section 502.10 are not technically deficient? If not, why?	Agree.
5.	Do you agree that the proposed amendments to Section 502.10, taken together with all ISO rules, support a fair, efficient, and openly competitive market? If not, why?	Agree.

Stakeholder Comment Matrix for the following:

1) Proposed Adjusted Metering Practice Implementation; and

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	Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
6.	Do you agree that the proposed amendments to Section 502.10 support the public interest? If not, why?	Agree.
7.	Please provide any comments or views on the need for the development of a related information document, including the type of content that should be included.	No comment at this time.
8.	If approved, the AESO will propose an effective date of April 1, 2022. Do you agree? If not, why?	Agree. It is EPC’s understanding that while Section 501.10 will have an effective date of April 1, 2022, this will account for a transitory period to allow any necessary metering alterations to be completed, and the timeline to comply with the new requirements in Section 501.10 will vary from substation to substation. Should there be changes to the timeline of the AESO’s AMP implementation plan, the effective date for amended Section 501.10 should be revised accordingly to ensure the timelines remain aligned.
9.	Do you have any additional comments regarding the proposed amendments to Section 502.10?	No comment at this time.

The AESO is seeking comments from Stakeholders on the implementation of the Adjusted Metering Practice– regarding the following matters:

	AMP Implementation Plan	Stakeholder Comments and/or Alternate Proposal
10.	Do you have any comments on the <i>Adjusted Metering Practice Implementation Plan</i> ?	Yes. On September 29, 2021, EPC had provided the AESO (amp.implementation@aeso.ca) with a number of comments and questions regarding the AMP implementation plan. To date, we have not seen any additional follow-up to that correspondence and would like to know what the AESO’s next steps are for addressing our previous comments and concerns. EPC continues to review the AESO’s AMP implementation plan in further detail to determine impacts. Additional questions may arise based on our review and depending on what the AESO’s responses are to our original questions submitted on September 29.

Stakeholder Comment Matrix for the following:

1) Proposed Adjusted Metering Practice Implementation; and

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	AMP Implementation Plan	Stakeholder Comments and/or Alternate Proposal
11.	Do you have comments in regard to the proposed treatment of costs for installing new revenue meters as outlined in the <i>Adjusted Metering Practice Implementation Plan – Background Information</i> document?	On slide 18 of the AESO’s presentation titled “AMP Implementation – Background Information” the AESO provided information regarding feeder metering costs for new builds and alterations. Can the AESO confirm that as part of its filing to the AUC, it intends to seek a determination that the AUC approve, in general, that TFOs will be including the costs of revenue metering infrastructure for future projects to be funded through things such as asset replacements (e.g., GTA or TCOS filings)?

Stakeholder Comment Matrix for the following:

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Period of Comment: October 14, 2021 through November 4, 2021	Contact: Joseph Shield
Comments From: EPCOR Distribution and Transmission Inc.	Phone: 780-412-8877
Date: [2021/11/04]	Email: jshield@epcor.com

Instructions:

- 1. Please fill out the section above as indicated.
- 2. Please refer back to the “related material” on the Stakeholder Engagement page on the AESO website.
- 3. Please respond to the questions below and provide your specific comments, if any. Blank boxes will be interpreted as favourable comments.

Stakeholder Comment Matrix for the following:

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The AESO is seeking comments from Stakeholders on the development of proposed Amendments to Section 502.10 – regarding the following matters:

Stakeholder Comment Matrix for the following:

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2) Proposed Amendments to Section 502.10 of the ISO rules, Revenue Metering System Technical and Operating Requirements (“Section 502.10”)



	Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
1.	Do you agree that the issue identified in the letter of notice requires the development of proposed amended Section 502.10? If not, why not?	EPCOR does not have any specific comments on this item, but does not want to be construed as providing favorable comments.
2.	Do you agree with the potential purpose of development of proposed amended Section 502.10? If not, why not?	EPCOR does not have any specific comments on this item, but does not want to be construed as providing favorable comments.
3.	Do you agree with the proposed consultation and timelines? If not, why not?	EPCOR does not have any specific comments on this item, but does not want to be construed as providing favorable comments.
4.	Do you agree that the proposed amendments to Section 502.10 are not technically deficient? If not, why?	EPCOR does not have any specific comments on this item, but does not want to be construed as providing favorable comments.
5.	Do you agree that the proposed amendments to Section 502.10, taken together with all ISO rules, support a fair, efficient, and openly competitive market? If not, why?	EPCOR does not have any specific comments on this item, but does not want to be construed as providing favorable comments.
6.	Do you agree that the proposed amendments to Section 502.10 support the public interest? If not, why?	EPCOR does not have any specific comments on this item, but does not want to be construed as providing favorable comments.
7.	Please provide any comments or views on the need for the development of a related information document, including the type of content that should be included.	EPCOR does not have any specific comments on this item, but does not want to be construed as providing favorable comments.
8.	If approved, the AESO will propose an effective date of April 1, 2022. Do you agree? If not, why?	EPCOR does not have any specific comments on this item, but does not want to be construed as providing favorable comments.
9.	Do you have any additional comments regarding the proposed amendments to Section 502.10?	<p>EPCOR requests clarity on whether the AESO intends to issue a functional specification on the types of projects included in Section (4) of the proposed Section 502.10 of the ISO Rules.</p> <p>EPCOR requests clarity on how the AESO will expect TFOs to apply the proposed amended Section 502.10 of the ISO Rules to projects that are currently in progress.</p>

Stakeholder Comment Matrix for the following:

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The AESO is seeking comments from Stakeholders on the implementation of the Adjusted Metering Practice– regarding the following matters:

	AMP Implementation Plan	Stakeholder Comments and/or Alternate Proposal
10.	Do you have any comments on the <i>Adjusted Metering Practice Implementation Plan</i> ?	EPCOR does not have any specific comments on this item, but does not want to be construed as providing favorable comments.
11.	Do you have comments in regard to the proposed treatment of costs for installing new revenue meters as outlined in the <i>Adjusted Metering Practice Implementation Plan – Background Information</i> document?	<p>EPCOR requests additional information on the AESO’s rationale for the cost treatment of Category C substations.</p> <p>EPCOR requests clarification on the methodology and the criteria the AESO is intending to use to classify the costs of the feeder meter between system and participant costs. As written, the Adjusted Metering Practice Implementation Plan does not provide any certainty as to how the costs for Phase 3 projects will be treated under the ISO Tariff. Does the AESO intend to classify the costs as “system-related” for future customer-driven metering installs?</p>

Stakeholder Comment Matrix for the following:

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2) Proposed Amendments to Section 502.10 of the ISO rules, Revenue Metering System Technical and Operating Requirements (“Section 502.10”)



Period of Comment: October 14, 2021 through November 4, 2021	Contact: Julia Ciccaglione
Comments From: Kalina Distributed Power	Phone: 403-999-8090
Date: 2021/11/4	Email: Jciccaglione@kalinapower.com

Instructions:

1. Please fill out the section above as indicated.
2. Please refer back to the “related material” on the Stakeholder Engagement page on the AESO website.
3. Please respond to the questions below and provide your specific comments, if any. Blank boxes will be interpreted as favourable comments.

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	Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
1.	Do you agree that the issue identified in the letter of notice requires the development of proposed amended Section 502.10? If not, why not?	<i>No</i>
2.	Do you agree with the potential purpose of development of proposed amended Section 502.10? If not, why not?	<i>No</i>
3.	Do you agree with the proposed consultation and timelines? If not, why not?	<i>No. The AESO proposes April 01 2022 as the first phase of the plan, yet the AESO has not held any virtual sessions nor provided adequate analysis for stakeholders to provide comment.</i>
4.	Do you agree that the proposed amendments to Section 502.10 are not technically deficient? If not, why?	<i>No. Please see answer to question 3 above.</i>
5.	Do you agree that the proposed amendments to Section 502.10, taken together with all ISO rules, support a fair, efficient, and openly competitive market? If not, why?	<i>No. The AMP itself is discriminatory against DCGs and it does not fundamentally reflect the physical flows of electricity from a DCG.</i>
6.	Do you agree that the proposed amendments to Section 502.10 support the public interest? If not, why?	<i>No. The AMP contributes to ongoing increased fixed system costs and passes those costs along to either ratepayers or DCGs. Rather than the AESO fixing their forecasting problems which has led to an expensive overbuilt system, along with their failure to plan for DCGs (which the AESO has continually stated), the AESO rather continues to find new ways to increase fixed system costs.</i>
7.	Please provide any comments or views on the need for the development of a related information document, including the type of content that should be included.	<i>The AESO states in its letter of October 14 2021 that it is relying on AUC Decision 22942-D02-2019 as the rational for the AMP, where the Commission concluded that AMP is required to ensure that “...the subsidy provided to distribution connected generators that the AESO considered to be partially enabled by the AESO’s existing metering practice” is either reduced or eliminated. This is a misleading statement by the AESO as they fail to cite the more recent decision by the Commission 26090-D01-2021, whereby no finding was made that a subsidy exists. It would be helpful if the AESO were more accurate and forthright in its characterizations rather than using outdated information.</i>

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	Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
8.	If approved, the AESO will propose an effective date of April 1, 2022. Do you agree? If not, why?	<i>No. Please see answer above.</i>
9.	Do you have any additional comments regarding the proposed amendments to Section 502.10?	<i>The AESO has not provided enough information or opportunity for discussion in order to make an informed decision.</i>

The AESO is seeking comments from Stakeholders on the implementation of the Adjusted Metering Practice– regarding the following matters:

	AMP Implementation Plan	Stakeholder Comments and/or Alternate Proposal
10.	Do you have any comments on the <i>Adjusted Metering Practice Implementation Plan</i> ?	<p><i>The plan is confusing and uses partial vagaries such as “Costs should be allocated based on cost causation, so that those who benefit bear the cost”. What does the AESO exactly mean by “benefit”? How is it defined?</i></p> <p><i>The AESO further states that “Costs cannot be allocated to a DCG after it has energized if the DCG does not directly cause those costs”. That is not sufficient. Generators make investment decisions on whether or not to proceed with a project well before energization including when a project makes its final investment decision (FID); a formal gate in the investment process. By the time a project makes its FID project economics are frozen. These statements by the AESO clearly show they have no idea how investment decisions are made by the private sector. It is further troubling given that the AESO and DCGs have already gone through a lengthy hearing on substation fractioning where it was made clear to the AESO that investment decisions are made well in advance of energization.</i></p>
11.	Do you have comments in regard to the proposed treatment of costs for installing new revenue meters as outlined in the <i>Adjusted Metering Practice Implementation Plan – Background Information</i> document?	<i>Please see above response.</i>

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1) Proposed Adjusted Metering Practice Implementation; and

2) Proposed Amendments to Section 502.10 of the ISO rules, Revenue Metering System Technical and Operating Requirements (“Section 502.10”)



<p>Period of Comment: October 14, 2021 through November 4, 2021</p> <p>Comments From: Lionstooth Energy</p> <p>Date: 2021/11/04</p>	<p>Contact: Erika Goddard</p> <p>Phone:</p> <p>Email: erika.goddard@lionstoothenergy.com</p>
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1. Please fill out the section above as indicated.
2. Please refer back to the “related material” on the Stakeholder Engagement page on the AESO website.
3. Please respond to the questions below and provide your specific comments, if any. Blank boxes will be interpreted as favourable comments.

The AESO is seeking comments from Stakeholders on the development of proposed Amendments to Section 502.10 – regarding the following matters:

	Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
1.	Do you agree that the issue identified in the letter of notice requires the development of proposed amended Section 502.10? If not, why not?	
2.	Do you agree with the potential purpose of development of proposed amended Section 502.10? If not, why not?	<p>Lionstooth agrees that the Commission directed the AESO to develop an AMP Implementation Plan, with the fundamental intent to align metering of substation feeders with the <i>Electric Utilities Act (EUA)</i>.</p> <p>Lionstooth does <u>not</u> agree that the AMP issue stems, in any way, from the presence of DCG. If the utilities are not compliant with the <i>EUA</i>, then it is on the utilities to ensure they are compliant, whether a DCG exists or not. The fact that 84% (~380) of existing substations already have feeder metering installed proves that the onus is on the utility to install meters compliant with <i>the EUA</i>.</p> <p>To be even more clear, if all feeders need to be gross metered to be compliant with the <i>EUA</i>, then this is a cost that is caused when the feeder is first constructed. It is not caused by a DCG connecting to that feeder. Even if the meter were to be installed at a similar time to the connection of a DCG, the need for the meter is not caused by DCG, it is caused by the <i>EUA</i>.</p>

Stakeholder Comment Matrix for the following:

1) Proposed Adjusted Metering Practice Implementation; and

2) Proposed Amendments to Section 502.10 of the ISO rules, Revenue Metering System Technical and Operating Requirements (“Section 502.10”)



	Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
3.	Do you agree with the proposed consultation and timelines? If not, why not?	<p>This consultation absolutely requires a virtual session, to further review the AESO's Implementation Plan and proposed changes, as neither is clear. During that session the AESO should also respond to the written feedback provided by stakeholders.</p> <p>Additional information and quantitative analysis <u>is</u> required to understand the extent, timing, and cost implications of the AMP, <u>prior</u> to proceeding with implementing the AMP.</p>
4.	Do you agree that the proposed amendments to Section 502.10 are not technically deficient? If not, why?	
5.	Do you agree that the proposed amendments to Section 502.10, taken together with all ISO rules, support a fair, efficient, and openly competitive market? If not, why?	<p>No. The AMP does <u>not</u> reflect the reality of actual physical electricity flows on the interconnected electric system, and therefore does not support a FEOC market.</p> <p>Again, the purpose of the AMP is to ensure compliance with the <i>EUA</i>, which has nothing to do with FEOC in the EOM.</p> <p>To suggest that the AMP will ensure “consistent and fair treatment” between TCG and DCG ignores all the other areas where disparities exist, to the benefit of TCG.</p>
6.	Do you agree that the proposed amendments to Section 502.10 support the public interest? If not, why?	No. Lionstooth remains unconvinced that implementing the AMP is in the public interest, on the basis that, despite frequent requests, there remains no quantitative analysis confirming that the AMP will achieve the AESO's desired outcomes.
7.	Please provide any comments or views on the need for the development of a related information document, including the type of content that should be included.	An ID should likely accompany 502.10.
8.	If approved, the AESO will propose an effective date of April 1, 2022. Do you agree? If not, why?	
9.	Do you have any additional comments regarding the proposed amendments to Section 502.10?	<p>An overbuilt Tx system and a lack of appropriate planning by the AESO has caused the high delivered cost of power in our market. Not DCG.</p> <p>Constantly pursuing change to metering and tariff structures discourages development, forces customers to choose between defection and the grid, and prioritizes wires utilities and TCG over load and DCG.</p>

Stakeholder Comment Matrix for the following:

1) Proposed Adjusted Metering Practice Implementation; and

2) Proposed Amendments to Section 502.10 of the ISO rules, Revenue Metering System Technical and Operating Requirements (“Section 502.10”)



The AESO is seeking comments from Stakeholders on the implementation of the Adjusted Metering Practice– regarding the following matters:

	AMP Implementation Plan	Stakeholder Comments and/or Alternate Proposal
10.	Do you have any comments on the <i>Adjusted Metering Practice Implementation Plan</i> ?	<p>Lionstooth did not find the Implementation Plan overly clear, with inconsistencies between the Plan and the Background Presentation.</p> <p>Focusing on cost impacts, the principles and guidance for cost treatment don’t illustrate the full picture:</p> <ul style="list-style-type: none"> • Costs should be allocated based on cost causation. In this case, compliance with the <i>EUA</i> has caused the need for a metering change, not DCG. • The AESO’s proposed Implementation Plan does disadvantage one group over another, specifically those who will bear the burden of the cost of compliance, without receiving any benefit. • Passing cost allocation issues onto the DFO is not an Implementation Plan, just more uncertainty and regulatory inefficiency. • Costs should not be allocated to DCG since the AMP has nothing to do with DCG and everything to do with <i>EUA</i> compliance. <p>While the Implementation Plan did <u>not</u> provide an estimate of the total cost of compliance with AMP, applying the \$750k average cost to the 60-70 Category C retrofit substations, places the total cost of compliance with the AMP at \$45 million to \$53 million.</p> <p>This notably does <u>not</u> include costs for implementing contract changes to substations already with gross metering, costs for entirely new substations to be outfitted with gross metering, and long-term O&M costs associated with revenue class gross meters.</p> <p>Lionstooth remains of the view that there has <u>not</u> been sufficient quantitative analysis demonstrating that the benefits of the AMP outweigh its costs.</p> <p>Changes are required to the AMP Implementation Plan to make it more clear in terms of extent, timing, and costs, and so that it will be be more efficient and effective.</p>

Stakeholder Comment Matrix for the following:

1) Proposed Adjusted Metering Practice Implementation; and

2) Proposed Amendments to Section 502.10 of the ISO rules, Revenue Metering System Technical and Operating Requirements (“Section 502.10”)



	AMP Implementation Plan	Stakeholder Comments and/or Alternate Proposal
11.	Do you have comments in regard to the proposed treatment of costs for installing new revenue meters as outlined in the <i>Adjusted Metering Practice Implementation Plan – Background Information</i> document?	See above.

Stakeholder Comment Matrix for the following:

1) Proposed Adjusted Metering Practice Implementation; and

2) Proposed Amendments to Section 502.10 of the ISO rules, Revenue Metering System Technical and Operating Requirements (“Section 502.10”)



Period of Comment: October 14, 2021 through November 4, 2021	Contact: Leandro Tomei
Comments From: Signalta Resources Limited	Phone: 403-875-8506
Date: 2021/11/04	Email: leandro.tomei@signalta.com

Instructions:

1. Please fill out the section above as indicated.
2. Please refer back to the “related material” on the Stakeholder Engagement page on the AESO website.
3. Please respond to the questions below and provide your specific comments, if any. Blank boxes will be interpreted as favourable comments.

Stakeholder Comment Matrix for the following:

1) Proposed Adjusted Metering Practice Implementation; and

2) Proposed Amendments to Section 502.10 of the ISO rules, Revenue Metering System Technical and Operating Requirements (“Section 502.10”)



The AESO is seeking comments from Stakeholders on the development of proposed Amendments to Section 502.10 – regarding the following matters:

	Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
1.	Do you agree that the issue identified in the letter of notice requires the development of proposed amended Section 502.10? If not, why not?	<i>No. The implementation of the AESO’s AMP and corresponding Rule 502.10 change is likely redundant due to the phase out of DG Credits as determined recently by AUC Proceeding 26090 and the subsequent denial to allow that decision to be Reviewed and Varied (AUC 26660).</i>
2.	Do you agree with the potential purpose of development of proposed amended Section 502.10? If not, why not?	<i>No, as above</i>
3.	Do you agree with the proposed consultation and timelines? If not, why not?	<i>No, as above #1</i>
4.	Do you agree that the proposed amendments to Section 502.10 are not technically deficient? If not, why?	<i>Without the AMP, no changes are required</i>
5.	Do you agree that the proposed amendments to Section 502.10, taken together with all ISO rules, support a fair, efficient, and openly competitive market? If not, why?	<i>Without the AMP, no changes are required</i>
6.	Do you agree that the proposed amendments to Section 502.10 support the public interest? If not, why?	<i>No. Given the AUC decision regarding phase out of DFO DG Credits, the incremental cost associated with continuing with the AMP Implementation needlessly inflates T costs for minimal if any benefit to consumers.</i>
7.	Please provide any comments or views on the need for the development of a related information document, including the type of content that should be included.	<i>Without the AMP, no new ID is required</i>
8.	If approved, the AESO will propose an effective date of April 1, 2022. Do you agree? If not, why?	<i>Without the AMP, no timeline is required</i>
9.	Do you have any additional comments regarding the proposed amendments to Section 502.10?	<i>No</i>

Stakeholder Comment Matrix for the following:

1) Proposed Adjusted Metering Practice Implementation; and

2) Proposed Amendments to Section 502.10 of the ISO rules, *Revenue Metering System Technical and Operating Requirements* (“Section 502.10”)



The AESO is seeking comments from Stakeholders on the implementation of the Adjusted Metering Practice– regarding the following matters:

Stakeholder Comment Matrix for the following:

1) Proposed Adjusted Metering Practice Implementation; and

2) Proposed Amendments to Section 502.10 of the ISO rules, Revenue Metering System Technical and Operating Requirements (“Section 502.10”)



	AMP Implementation Plan	Stakeholder Comments and/or Alternate Proposal
10.	Do you have any comments on the <i>Adjusted Metering Practice Implementation Plan</i> ?	<p><i>Given the planned phase-out of DG Credits (starting Jan. 2022), the AMP becomes a low value / high cost scope of work that provides minimal if any benefit to load customers but further add to the Transmission Rate bases of TFO’s further escalating rates. It also increases the administrative burden on an already resource constrained utilities. The exclusion of MG contributions based on their size and nature (sized to a person’s load) is not reasonable based on the up to 5MW approval level now in place. These MG’s collectively can impact a feeder significantly and the only party that will bear the brunt of the new measured import are DGs connected to that feeder. If the AESO’s intent is to ensure a more accurate measurement flow to and from the transmission system, MG’s should be included as large MG’s have bi-directional interval meters installed as part of their interconnection requirements.</i></p> <p><i>There are far higher value system issues at play and removal of this low value / high cost scope of work will allow industry efforts to be better allocated. These include the AESO, DFO’s and their avoided work collecting and analyzing feeder data, TFO’s and the avoided projects.</i></p> <p><i>The removal of AMP also supports red tape reduction.</i></p>
11.	Do you have comments in regard to the proposed treatment of costs for installing new revenue meters as outlined in the <i>Adjusted Metering Practice Implementation Plan – Background Information</i> document?	<p><i>If the plan is to continue with implementation of AMP, why can the DFO automated feeder meters already installed not be utilized? Most are more or less in place now and despite not being Revenue Class meters, would provide as reasonable levels of accuracy as Revenue class meters with MG contributions not considered. They can reflect negative flows from the distribution system.</i></p> <p><i>The costs provided in the background information reflects around 10 substations needing Physical work. Given the number of DER’s currently connected, I would venture the number to be at minimum triple the number identified. The time to get these substations upgraded is far underestimated and DG Credits will have been phased out long before the stations needing the meters is complete.</i></p> <p><i>Alberta’s unfettered support of an energy only market combined with the provision of an unconstrained transmission system to GFO’s is needlessly jeopardizing the Alberta Advantage. Commodity prices for electricity and Wires charges need to be considered together as they are interdependent to load customers.</i></p>