

Stakeholder Comment Matrix – Sept. 14, 2020

Request for Feedback on 2020-2021 Plan for ISO Tariff-Related Activities



Period of Comment: Sept. 14, 2020 through Oct. 6, 2020 Comments From: TransAlta Corporation Date: 2020/10/06	Contact: Akira Yamamoto Phone: 403-267-7304 Email: akira_yamamoto@transalta.com
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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 matrix per organization.**
4. Email your completed comment matrix to tariffdesign@aeso.ca by **Oct. 6, 2020**.

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

	Questions	Stakeholder Comments
1.	Is the publication of the <i>2020-2021 Plan for ISO Tariff-Related Activities</i> (“2020-2021 Plan”) useful to you? Would any additional information be helpful? Please be specific.	<p><i>The 2020-2021 Plan was useful for appreciating all of the tariff activities and staging of those sub-activities</i></p> <p>TransAlta appreciates the publication of the <i>2020-2021 Plan for ISO Tariff-Related Activities</i>. It was helpful to see how the AESO categorizes its tariff work and the different sub-activities related to each.</p>
2.	Are there any additional tariff-related activities that in your view require the AESO’s and stakeholders’ attention in 2021 that are not listed in the 2020-2021 Plan?	<p><i>No, the activities that are planned may have too large a scope already to be delivered on in 2020-2021</i></p> <p>We do not suggest any additional tariff-related activities in the 2020-2021 plan. We note that the plan is already very ambitious given how complicated the issues are and the significance of their impact on customers.</p> <p>We recommend that the AESO maintain flexibility in its views about the target dates and not rush or cut short the stakeholder consultation process to achieve its plan. The bulk and regional tariff rate review is a significant endeavor that is likely to have impacts on many stakeholders. Spending the time that is necessary to properly consult with stakeholders helps to minimize information requests and narrow the scope of the regulatory proceeding process. While we agree that the stakeholder consultation process cannot resolve all issues, the regulatory proceeding process is</p>

		<p>an adversarial process that is not set up to facilitate a dialogue between parties that may lead to the discovery of approaches or solutions that could benefit all stakeholders. In this respect, we caution against viewing the regulatory process as an extension, supplement or replacement to a robust stakeholder consultation.</p>
<p>3.</p>	<p>Do you have suggested changes to the timing of activities in the 2020-2021 Plan schedule? If yes, please be specific to why you would like to see the timing changed and what the suggested timing should look like.</p>	<p><i>Prioritize and take the time that is necessary for Tariff Modernization so that it provides the right framework for the future</i></p> <p>The Tariff Modernization work is highly condensed given that it seeks to tackling issues that have grown over time and includes scope that lays out the path to the future. It is hard to believe that issues that have spanned more than half a decade can be resolved through consultations that will take place over 6 months.</p> <p>While we agree that having a target date is helpful for planning purposes, we also think that it is of paramount importance to comprehensively deal with tariff issues by creating the framework that can enable efficient investment over the next few decades. Customers and generators are seeking assurances of stability, consistency and long term commitment to the framework that provides signals for investment. Tariff Modernization should be viewed as the key priority of all of the tariff-related work.</p>
<p>4.</p>	<p>Do you have any other suggestions or comments you would like to share with the AESO related to the 2020-2021 Plan?</p>	<p><i>Energy storage should be separated out of the Bulk and Regional Rate redesign</i></p> <p>We recommend that the energy storage be dealt with separately as its own initiative rather than as a tack-on to the bulk and regional rate redesign work. Within the scope of the bulk and regional rate redesign, energy storage has low priority.</p> <p>The scope of the bulk and regional rate redesign (reconsideration of the 12-CP approach) has little to do with energy storage but is significant for a modernized tariff framework. We are concerned that if the AESO pursues energy storage as part of the bulk and regional rate redesign work it is unlikely to get the attention it deserves.</p> <p>From a practical perspective, we note that there are different stakeholders for bulk and regional and energy storage tariff matters and all stakeholders are forced to attend long sessions when they may only be interested in a small portion of the materials covered. We view this as a driver of stakeholder fatigue as it results in very long sessions where attention is divided due to packed agendas of potentially unrelated matters.</p>

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

