

Stakeholder Comment Matrix – May 28, 2020

Participant-Related Costs for DFOs (Substation Fraction) and DFO Cost Flow-Through
Technical Session (2B)



Period of Comment: May 28, 2020 through June 11, 2020

Comments From: ENMAX Power Corporation

Date: 2020/06/15

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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 evaluation per organization.**
4. Email your completed comment matrix to tariffdesign@aeso.ca by **June 11, 2020**.

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

	Questions	Stakeholder Comments
1.	<p>Please comment on the Technical Session 2B facilitated by the AESO on May 28, 2020. Was the session valuable? Was there something we could have done to make the session more helpful? Please advise and be as specific as possible.</p>	<p>The session was focused and addressed several of EPC's outstanding issues.</p>
2.	<p>The following five questions are seeking comments on the Technical Session 2B discussion regarding the outstanding design details identified on Slide 27.</p> <p>Please comment if (1) your organization does have or does not have agreement in principle and (2) any additional clarity or consideration to provide on the following outstanding design details:</p> <ul style="list-style-type: none"> • Substation fraction = 1 for DFOs 	<p>In principle, EPC is in support of a substation fraction equaling one for DFOs.</p>
3.	<p>Please comment if (1) your organization does have or does not have agreement in principle and (2) any additional clarity or consideration to provide on the following outstanding design details:</p> <ul style="list-style-type: none"> • Determining a \$/MW charge for DCG 	<p>In principle, EPC is in support of a \$/MW charge for DCG. EPC understands that the \$/MW charge will reflect the costs of connecting to the regional and bulk transmission system, inclusive of transformation facilities. EPC agrees that the intention for the AESO should be for the \$/MW charge to be transparent and available to DCG at the time of their final investment decisions need to be made and that the \$/MW charge will be updated annually to align with current transmission costs.</p> <p>As raised by the DCG Consortium in the stakeholder session, EPC sees benefit in determining which types of costs would be included in this framework. Having a transparent and typical asset list (perhaps with some flexibility for one-off scenarios) should be the objective. For shared assets, EPC requests that the AESO confirm whether it will be considering any form of asset utilization calculations as suggested by FortisAlberta?</p>

4.	<p>Please comment if (1) your organization does have or does not have agreement in principle and (2) any additional clarity or consideration to provide on the following outstanding design details:</p> <ul style="list-style-type: none"> Determining the applicability of the DCG charge 	<p>In principle, EPC is in support of the applicability of the DCG charge. The charge should only apply to DFO distribution-connected facilities and should not be required for facilities that are directly connected to the transmission system. EPC understands that the calculation of MWs will be based on the sum of the feeder flows into the bus by the generator(s).</p>
5.	<p>Please comment if (1) your organization does have or does not have agreement in principle and (2) any additional clarity or consideration to provide on the following outstanding design details:</p> <ul style="list-style-type: none"> Determining the administration of the DCG charge 	<p>EPC requires clarity on the administration of DCG charges. At a high level, EPC understands that the DCG charge will be managed by the DFO and the funds will be used as a revenue offset against DFO contributions made on behalf of loads. The AESO has stated that there is the potential that the cost of the administration of the DCG charge could outweigh the benefit to load. It is unclear to EPC how the AESO envisions that the proposal will be administered and requests that the AESO elaborate further on the administrative process and costs that it is anticipating.</p>
6.	<p>Please comment if (1) your organization does have or does not have agreement in principle and (2) any additional clarity or consideration to provide on the following outstanding design details:</p> <ul style="list-style-type: none"> Looking towards implementation 	<p>In the session, the AESO stated that they were considering an interim decision to re-examine existing customer contribution decisions (“CCD”). EPC requests that the AESO clarify:</p> <ul style="list-style-type: none"> What determining factor(s) will be used to decide if an existing CCD should be re-examined (e.g. date of issue, payments made, etc.)? Whether it is pursuing an interim decision to allow for more time to consider their overall proposal?
7.	<p>Additional comments</p>	<p>EPC requests that the AESO clarify if it will be focusing solely on an Alberta-wide \$/MW charge or will it be considering POD specific \$/MW charges?</p>

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