

AESO INFORMATION REQUESTS TO PPGA

AESO.PPGA-001

Reference: PPGA POD Charge Evidence – Page 2, 2nd Paragraph

“The AESO’s POD rate is flawed because:

...

- the AESO was not able to develop accurate statistically proven relationships and ultimately a sound POD cost-causation relationship”

Request:

Please provide the reference which directs the AESO to develop a statistically proven relationship from the data collected in the development of the Raw Interconnection Project Cost Function.

AESO.PPGA-002

Reference: PPGA POD Charge Evidence – Page 3, 1st Paragraph, 2nd Sentence

“Furthermore, the impact on all customers is fair since all customers pay an equal, per MW demand charge.”

Request:

Please fully explain how the impact of paying an equal \$/MW demand charge is “fair” for all customers.

AESO.PPGA-003

Reference: PPGA POD Charge Evidence – Page 5, 1st Bulleted Paragraph, Last Sentence

“The Greenfield data does not include all sizes of PODs (no sites below 7.5 MW, no sites over 43 MW) nor any data from the urban locations (ENMAX, EPCOR).”

Request:

Please confirm that the contribution study data filed as Appendix G to the AESO’s 2007 GTA included five projects from urban locations, namely, project numbers 130, 308, 333, 425, and 506, identified as ENMAX and EPCOR projects on the DTS Projects tab.

AESO.PPGA-004

Reference: PPGA POD Charge Evidence – Page 7, 1st Paragraph, 1st Sentence

“At the time of the 2006 decision, the Board acknowledged the inequity in DTS rates and requested that the AESO propose a solution to reduce the burden on smaller customers.”

Request:

Please provide specific reference(s) where the EUB requested that “the AESO propose a solution to reduce the burden on smaller customers.”

AESO.PPGA-005

Reference: PPGA POD Charge Evidence – Page 7, 2nd Paragraph

“By granting relief in the 2006 tariff, the EUB recognizes the need to mitigate rate increases. The PPGA believes that the AESO has not fairly, or adequately, considered rate relief as directed by the EUB.”

Request:

Please provide all references where the EUB has directed the AESO to consider rate relief as part of its rate development.

AESO.PPGA-006

Reference: PPGA POD Charge Evidence – Page 7, 3rd Paragraph, Last 4 Sentences

“It is unfair to now impose and maintain a large increase in rates to smaller T connected customers, after the T facilities have been constructed, particularly if the rate increase is based upon unreliable data. This action by the AESO contravenes good rate design practices of producing non-discriminatory, fair and predictable rates on which customers can base their behaviour in a sound, efficient and rational manner. The AESO appears to justify several of its requests based on the desire to send appropriate ‘price signals’ to customers. The reality of the situation here is that the AESO is proposing dramatic changes after customers have responded to the signals they were previously given.”

Request:

Is it PPGA’s position that all existing customers should be exempt from changes to rates as a result of updated cost information used in the determination of rates? Please fully explain your response.

AESO.PPGA-007

Reference: PPGA POD Charge Evidence – Page 8, 1st Paragraph, 1st Sentence

“The PPGA’s primary concern with the AESO’s proposed filing relates to the conclusions reached by the AESO in reliance upon data that is of questionable validity.”

Request:

Please fully identify all data the PPGA considers to be “of questionable validity” and fully explain why PPGA is of that opinion.

AESO.PPGA-008

Reference: PPGA POD Charge Evidence – Page 14, 1st Paragraph, 2nd Sentence

“For general trending, this R^2 value may, under certain circumstances, be considered somewhat acceptable; however, an R^2 value of this low to moderate level is certainly NOT acceptable for accounting, billing or rate design purposes.”

Request:

Please provide all evidence that supports the PPGA position that an R^2 of 0.26 or R value of 0.51 as identified in the AESO Study is “certainly NOT acceptable for accounting, billing or rate design purposes.”

AESO.PPGA-009

Reference: PPGA POD Charge Evidence – Page 15, 1st Bulleted Paragraph

“The PPGA believes that some portion of a fixed charge is appropriate and representative as a minimum cost associated with a POD. There are many methods to calculate this charge. The AESO’s proposed minimum y intercept approach is useful in that it sets the minimum cost of a POD. The PPGA believes that the AESO’s recommendation for a fixed monthly POD charge of \$4,725 is reasonable and a significant improvement over the 2006 result.”

Request:

Please fully reconcile why the PPGA considers the AESO’s minimum y intercept approach in determination of the fixed monthly charge to be appropriate and yet has expressed serious concerns with the data used in the POD charge determination.

AESO.PPGA-010

Reference: PPGA POD Charge Evidence – Page 18, 3rd Paragraph, 1st Sentence

“The data in the table is from a sample of 10 recently completed PPGA interconnection projects in Alberta and B.C.”

Request:

Please provide all detailed project data for each of the 10 recently completed PPGA interconnection projects in the above reference.

AESO.PPGA-011

Reference: PPGA POD Charge Evidence – Page 21, 1st Paragraph, Last Sentence

“To accommodate for cost increases and as a proxy for including a cost escalation in the design, the AESO rounded up its estimate of transformation costs from \$661/MW to \$700/MW.”

Request:

Please fully explain if the PPGA’s proposed PSC of \$720.00/MW is intended as an alternative to the AESO’s proposed 2007 PSC of \$1,905.00/month, \$1,252.00/MW/month for the first 7.5 MW of Billing Capacity, and \$310.00/MW/month for all Billing Capacity over 7.5 MW.