



Stakeholder Comment and AESO Replies Matrix
AESO Consultation – Competitive Procurement Process
September 17, 2010

The AESO is asking market participants and interested parties to indicate their interest in participating in the AESO's consultation regarding the AESO's proposed competitive procurement process and to provide comments on the related Terms of Reference and Discussion Paper.

Date of Request for Comment: <u>2010-MM-DD</u> Period of Consultation: <u>2010-MM-DD</u> through <u>2010-MM-DD</u> Comments From: <u>ATCO ELECTRIC LTD.</u> Date [yyyy/mm/dd]: <u>2010-11-04</u>	Contact: <u>Sett Policicchio</u> Phone: <u>780-420-7731</u> E-mail: <u>sett.policicchio@atcoelectric.com</u>
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Interest in Participating in AESO Consultation for a Proposed Competitive Procurement Process		
Please indicate your interest in participating in this consultation		
	Stakeholder Comment ATCO Electric letter submitted September 28/10 indicating intent to participate.	
	<input checked="" type="checkbox"/> Interested <input type="checkbox"/> Not Interested	
Terms of Reference - In-Scope Section		
Do stakeholders agree with the scope set out in the Terms of Reference? Are there any other documents the AESO should consider		



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as in scope?		
Stakeholder ATCO ELECTRIC LTD.	Stakeholder Comment OTHER DOCUMENTS: <ul style="list-style-type: none"> • Include documented learnings from similar endeavors, both in Alberta (early 2000's) and other parts of the world • Locate and include for analysis any available subject matter expert reports on similar undertakings (academic and independent consultant) • Engage an independent consultant to provide a report on these proposed changes in Alberta and potential impacts 	AESO Replies
	<input type="checkbox"/> Support <input type="checkbox"/> Oppose	
Terms of Reference – Out-of-Scope Section		
Do stakeholders agree with the out-of-scope section?		
Stakeholder	Stakeholder Comment	AESO Replies
	<input type="checkbox"/> Support <input type="checkbox"/> Oppose	
Terms of Reference - Consultation Activities, Documents and Schedule Section		



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Do stakeholders agree with the consultation activities, documents and schedule?		
Stakeholder	Stakeholder Comment	Replies
	<p>Consultation activities should include studying experience from other jurisdictions – learnings could be very instructive and prevent potential problems and/or rework in rolling out any change in Alberta. Schedule should reflect this.</p>	
Terms of Reference - Other Comments		
Do stakeholders have any other comments regarding the Terms of Reference for the competitive procurement process documents?		
Stakeholder	Stakeholder Comment	
	<p>More information required on AUC approval process</p>	
	<input type="checkbox"/> Support <input type="checkbox"/> Oppose	
Discussion Paper		
The AESO is seeking stakeholder comments regarding the proposed implementation schedule.		
Stakeholder	Stakeholder Comment	
	<p>1) Implementation Schedule: Include additional time to evaluate experience of other jurisdictions and seek independent consultant opinion (see specific</p>	



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	<p>recommendation in “Other Stakeholders Comments”).</p> <p>2) Additional information required on process steps between March 9 and Fall 2011 Implementation</p>	
	<p><input type="checkbox"/> Support</p> <p><input type="checkbox"/> Oppose</p>	
<p>Discussion Paper</p>		
<p>The AESO is seeking stakeholder comments regarding the objectives and principles to be used in the design of a competitive procurement process for CTI in Alberta.</p>		
<p>Stakeholder</p>	<p>Stakeholder Comment</p> <p>The following comments are also included as Attachment “A” for ease of reading.</p> <p>1. Introduction</p> <p>ATCO Electric welcomes the opportunity to provide its views on this important question. The existing Alberta electricity grid was developed according to a regulatory and legislative framework which has served Albertans well. However, as the grid is undergoing significant expansion, as outlined in the government’s 2008 Provincial Energy</p>	



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	<p>Strategy, it is prudent to examine the means by which the new facilities will be engineered, constructed, and operated. From ATCO Electric’s perspective, the following principles and objectives should be used to guide the grid expansion. AESO’s goals from Section 2.1 of its Discussion Paper have been incorporated.</p> <p>2. Principle 1: maintain a clear line of accountability, authority, and liability</p> <p>The existing framework has evolved over decades and places a great deal of accountability, responsibility and liability on the TFOs to ensure prudence of costs and performance (both construction and operations) to the benefit of consumers. This same level of regulatory oversight must not be compromised in implementing broad changes, including the competitive procurement of transmission.</p> <p>Therefore, new entrants and new relationships must not lessen or blur the following key responsibilities, not only in capital project development, but in system operations as well:</p>	
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	<ul style="list-style-type: none"> a. System reliability, safety and quality of service b. Lifecycle costs and consumer tariffs c. Responsibilities for management of costs -- prudence, changes to cost and scope of work, consequences for non-performance, and potential disallowances d. Knowledge of and compliance with operating and reliability standards and any subsequent changes (costs incurred and liabilities assumed) e. Community, Aboriginal, landowner and customer relationships f. Project management and construction practices <p>Under its suggested models, AESO would clearly have to assume these responsibilities as a counter party to a contract. In essence, AESO would be taking on the full responsibility and liability of the TFOs with respect to these projects.</p>	
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	<p>3. Principle 2: ensure full protection from harm to existing grid assets</p> <p>Due to the interconnected nature of electricity grids, non-performance in any area – from development and construction through operations – has the potential to do physical and financial harm to the connected elements, on both the supply side and the consumption side. The dramatic changes that are being contemplated must not compromise these existing investments, and therefore there should be an explicit recognition of parties’ rights, liabilities, and mitigation options.</p> <p>4. Principle 3: ensure a level playing field for all participants</p> <p>AESO’s Alternative 1 (“Own”) opens the market to new TFOs as an alternative to meet AESO’s goal to “create opportunity for new entrants”. New TFOs are not inherently “better”, and ATCO Electric questions why the AESO would state as a goal to “create opportunity for new entrants”. This implies a bias against incumbents. If new TFOs are to be</p>	
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	<p>encouraged to participate in the Alberta market, with whatever bidding strategies they may bring, the incumbent TFOs must be allowed to compete on the same basis unencumbered by any discriminatory measures. For example, economies of scale and other features of the incumbent TFOs should not be treated as unfair advantages that must somehow be adjusted for in favour of new entrants. Clearly, all bidders must be compliant with AESO standards.</p> <ul style="list-style-type: none">a. AESO’s “new entrants” goal should not be stated as a goal. It might be suggested by some to be a contributing factor to the goal of cost minimization (which is clearly a goal).b. Opportunities for innovation – technical, project management, labour relations, etc - must be available to all participants. Incumbents can’t be restricted from these opportunities solely as a consequence of their incumbent status.c. Over the years, the construction of power lines by others with	
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	<p>eventual transfer of ownership to the utilities has not necessarily resulted in cost and/or schedule advantages.</p> <p>5. Principle 4: ensure a stable utility investment climate</p> <p>ATCO is a financially strong, creditworthy, long-term player in the Alberta market as evidenced by our consistently strong corporate debt ratings. In determining these ratings, the financial community considers the stability of the regulatory and legislative framework within which we operate. Related to this is a history of regulatory transparency and consistency that has resulted in generally predictable utility rates for service. Regulatory innovation involving rate design is possible, but with appropriate regulatory rule changes.</p> <p>6. Recommendations:</p> <p>With these principles in mind, ATCO Electric suggests the following guidelines for going forward:</p>	
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	<p>a. Understand the Risks: Changes must be thought through and introduced in a measured way. Risks should be examined and understood prior to adopting changes because of the potential for increased costs.</p> <p>b. Learnings from Others: Learn from the experience of others, and from Alberta’s own experience with competition earlier this decade. The AESO notes in its Discussion Paper that it will consider applicable lessons from other jurisdictions. To this end, ATCO Electric strongly suggests that the AESO conduct a “workshop” including an independent consultant, representatives of other jurisdictions and perhaps even customers who have built their own transmission for transfer to TFOs.</p> <p>c. Staged Approach: CTI may be the worst place to start. By definition, these projects are critical to the operation of the grid. It would</p>	
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	<p>seem prudent to adopt a staged approach, testing the concepts on smaller projects to minimize risks to the system.</p>	
	<p><input type="checkbox"/> Support <input type="checkbox"/> Oppose</p>	
<p>Discussion Paper</p>		
<p>The AESO is seeking stakeholder comments regarding additional alternatives including associated advantages and disadvantages for the competitive procurement process.</p>		
<p>Stakeholder</p>	<p>Stakeholder Comment</p> <p>The following Alternative is also included as Attachment “B” for ease of reading.</p> <p>Alternative 3: EPCM/EPC Managed by TFO</p> <p>ATCO Electric submits this alternative which provides the benefits of competition with respect to the most significant component of the overall lifecycle costs of a project, and preserves the advantages of legacy knowledge, experience and culture of Alberta corporations, to the benefit of Albertans.</p> <p>ATCO Electric’s preliminary research of the experience and directions in other jurisdictions</p>	



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	<p>suggests these initiatives are not yet fully operating models and may not necessarily be applicable to Alberta due to their narrow scope, i.e. these other jurisdictions are not attempting to apply their concepts to anything near the magnitude and complexity of CTI. Keeping this in mind as well as the recent experience here in Alberta, ATCO Electric puts forward a model for consideration that aligns with our principles outlined in Attachment “A” and generally with AESO’s goals and objectives.</p> <p>Under this model, the AESO would assign a project to the incumbent TFO who would utilize either an EPCM or an EPC contracting strategy. EPCM/EPC would be bid out by the TFO who would manage the bid process and provide the AESO with transparency through regular cost and schedule updates. The TFO would retain and control the Right-of-Way (ROW) Planning and Permitting functions and own and operate the line after completion of construction. TFO control of these functions is key to ongoing and successful community and Aboriginal relations. This model differs from the AESO’s “EPC” alternative in two important aspects: who owns the ROW function, and who has responsibility for the bid process and becomes the counter-</p>	
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	<p>party to the selected entity. For both of these key areas, ATCO Electric suggests that these functions remain with the TFO.</p> <p>The Process for Alternative 3 would include similar steps as those listed in AESO Alternative 2. In Alternative 3, under the EPCM contracting strategy, engineering and procurement would be competitively bid, and construction management and project management services would be performed in-house and/or tendered, depending on the size and complexity of the project. This would provide the TFO with greater project control and visibility around costs and schedule than an EPC contracting strategy. There may be circumstances where the TFO determines an EPC strategy would be preferable, particularly if the scope of work is well defined.</p> <p>The AESO determines any additional reporting requirements of the TFO during the bid and construction process such that it is fully satisfied with the competitive process undertaken by the TFO.</p> <p>Advantages and disadvantages of Alternative 3 are summarized below, generally using the</p>	
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	<p>AESO’s Goals for the Process for CTI :</p> <p>Advantages</p> <p>a) Cost minimization without adversely affecting system reliability</p> <p>ATCO Electric’s Alternative 3 would create incentive for innovation in design, development and construction methods, and ensure competitive prices from the EPCM/EPC Entities, which will minimize development and construction costs.</p> <p>Alternative 3 can be shown to be cost efficient. Assigning the project to the TFO and placing the costs in the rate base should result in the lowest long term costs as the TFO does not have to add risk margins to cost estimates.</p> <p>b) Safety, Reliability and Adherence to AESO and TFO Standards</p> <p>TFOs can use their own designs to ensure optimization of life cycle facility costs, ensure that safety is addressed in the design and deal with the complexities of</p>	
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	<p>emergency response planning and operation coordination issues with other parties.</p> <p>Having suppliers and contractors bid on all equipment ensures the latest innovations are utilized. Having the TFOs manage the EPCM/EPC process will ensure that such choices are always made in the interest of long term sustainability of the network, optimal lifecycle asset costs and benefits to customers.</p> <p>c) Efficient investment, operation, maintenance and use of transmission assets and Regulatory predictability</p> <p>Fully utilizes incumbents’ institutional legacy knowledge, particularly with respect to Alberta.</p> <p>EPCM/EPC contracting is an established practice, understood by current participants and the regulator. In addition, it has been proven to work successfully. As an example, in recent years ATCO Electric has effectively procured SVCs through competitive turnkey contracts. Also, our</p>	
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	<p>current practice is to competitively procure engineering and other services with many of our transmission projects. Currently, we are pursuing competitive bids on the converter stations, which is a significant component of the east DC transmission line.</p> <p>The TFO has experienced people, significant financial and support resources, proven processes and systems in order to set standards, run bid processes and manage performance of contractors and equipment suppliers. The expertise includes a well-developed commercial understanding of contract law and remedial contract actions that achieve well-designed and constructed facilities at reasonable life-cycle costs.</p> <p>If the AESO was to manage the EPC bidding, it would be assuming accountability to customers for project cost and schedule deliverables as well as associated legal liabilities for contract performance. In addition, AESO would have to staff up dramatically to be able to manage this work, in a market of growing scarcity of the requisite skills and</p>	
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	<p>experience. In the absence of an organizational track record of delivering substantial infrastructure projects, this would add unnecessary project risk and related cost to the process.</p> <p>d) Transparency and Enhanced Reporting</p> <p>The contractual provisions and relationships between the TFO and the EPCM/EPC entity would introduce opportunity for enhanced reporting and increased transparency. This could save time in hearings and help promote continuity, efficiency and flow of project responsibility.</p> <p>e) Opportunity for Innovation</p> <p>ATCO Electric has always complied with the traditional regulatory cost of service model to include capital costs in tariff. Contrary to the disadvantage stated in AESO’s EPC model that “this limits the opportunity for financial innovation”, such innovation is possible under the EPCM/EPC model with appropriate regulatory rule changes.</p>	
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	<p>f) Consistency, Administratively Straightforward and Efficient</p> <p>Make Use of Existing Processes – This model would avoid the need for the AESO to duplicate systems, processes and capabilities that already exist at the TFO’s, and would avoid the associated extra work, costs, schedule delays, and uncertainty. Having the AESO develop and administer a new process would take time, cost money and introduce unnecessary development risk that would ultimately be paid for by customers. Most of the cost of infrastructure is currently in engineering and construction.</p> <p>Continuity and Efficiency - Provides continuity of process within one entity and does not require significant changes to established AESO and AUC roles and practices</p> <p>Staged Approach - Supports a staged approach, allowing opportunity to evaluate the extent to which objectives have been met without introducing drastic changes to</p>	
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	<p>existing system, potentially putting critical infrastructure timelines at risk.</p> <p>g) Long-Standing Stakeholder Relations with Landowners and Aboriginal Groups</p> <p>The Incumbent TFO will have direct responsibility for and manage the Right-of-Way Planning process and, as such, will continue to be involved in consultation to support siting, land acquisition and filing of the Facility Application.</p> <p>Requiring the TFO to perform the ROW and permitting processes builds on existing, successful practices and relationships with Aboriginal groups and landowners rather than having multiple new participants attempt to reinitiate this lengthy and sensitive process. The TFO has existing long-term relationships which go back for decades and will continue for decades.</p> <p>Given the critical nature of the facilities contemplated, ongoing access to those facilities is paramount in ensuring the long term integrity of those assets and hence the system. Securing the right of way is the</p>	
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	<p>first step in a very long term relationship between the owner/operator of facilities and those with an interest in the land. Access to facilities for inspections, vegetation management, maintenance and emergency response is fundamental to the ongoing safe reliable operation of the system.</p> <p>h) Opportunity for new entrants</p> <p>ATCO Electric’s Alternative 3 provides for new entrants through competitively bid EPCM or EPC in a controlled manner so that impacts to existing system and processes can be assessed, and risks of making significant changes can be properly managed.</p> <p>i) Clear accountabilities</p> <p>Clear accountabilities will be established through project plans, reporting protocols, cost monitoring functions, and any other appropriate mechanisms which are introduced.</p>	
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	<p>Disadvantages:</p> <p>a) ATCO Electric’s alternative could be seen as favouring the incumbent TFOs. However, this model supports a staged approach and does not necessarily preclude new transmission owners at a later date if the staged approach does not meet AESO goals. Given the criticality of the electrical transmission system, a staged approach is a prudent approach.</p> <p>b) The EPCM/EPC approach requires additional dedicated and experienced project management oversight to ensure adherence to cost and budget and to manage contracts; however, the incumbent is well positioned to understand the resource requirements to undertake this work utilizing its project management principles and practices, and its experience and understanding of bid process, engineering, procurement and construction of transmission lines in Alberta.</p>	
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Discussion Paper		
The AESO is seeking stakeholder comments regarding the process steps in the Own Alternative.		
Stakeholder	Stakeholder Comment No comment at this time	
	<input type="checkbox"/> Support <input type="checkbox"/> Oppose	
Discussion Paper		
The AESO is seeking stakeholder comments regarding the advantages, as well as any other advantages and disadvantages the stakeholder believes are appropriate for the Own Alternative.		
Stakeholder	Stakeholder Comment Comments on AESO’s stated advantages and disadvantages re Own Alternative: <ul style="list-style-type: none"> • The introduction of another party owning major transmission infrastructure would clearly require a duplication of operations and maintenance organization -- local skilled staff, tools, heavy equipment, ARS compliant processes and procedures, administrative and overhead -- required to operate and maintain such facilities. • The introduction of another entity owning and operating major T facilities complicates 	



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	<p>operational interfaces and will require greater coordination in areas like emergency response planning and trouble shooting control and protection problems.</p> <ul style="list-style-type: none"> • Potential for lifecycle efficiencies needs to be supported by analysis and it would be advisable to quantify the gains before proceeding on that assumption • Successful relationships are critical and take significant time and effort to build and maintain. Having one entity assume and manage these relationships throughout the project is a sound approach. However, new entrants will likely need additional time to establish these relationships which, as a minimum, will add time to the schedule and may also put existing relationships at risk. The idea of several entrants approaching landowners will create confusion. • Added process time associated with uncertainties of an untested model may have been underestimated – likely unacceptable risk for a CTI project <p>Other Disadvantages:</p> <ul style="list-style-type: none"> • Significant change to existing role of AESO; in fact, AESO would be taking on the full 	
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	<p>responsibility and liability of the TFOs with respect to these projects.</p> <ul style="list-style-type: none"> • Greatly increased AESO workload, responsibilities and staffing requirements will lead to additional customer costs • Additional time required for new transmission owners to become familiar with Alberta regulatory environment and to develop landowner and First Nations relationships • Inefficiency of introducing non-standard designs, and inconsistent construction practices • Participants in bid process may build and sell a project -- not necessarily in the best interests of Albertans • Very difficult to clearly define scope of work at early stages therefore bids will reflect this and lead to costly extras • Current proposal does not allow for a test period on non-critical infrastructure; applying test on something less critical would be advisable and allow time and evaluation to either make improvements or more easily withdraw from an unworkable process. 	
	<p><input type="checkbox"/> Support <input type="checkbox"/> Oppose</p>	



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Discussion Paper		
The AESO is seeking stakeholder comments regarding efficient risk-sharing options that will optimize the overall cost of CTI projects.		
Stakeholder	Stakeholder Comment	
	<input type="checkbox"/> Support <input type="checkbox"/> Oppose No comment at this time	
Discussion Paper		
The AESO is seeking stakeholder comments regarding the process steps in the EPC Alternative.		
Stakeholder	Stakeholder Comment	
	<input type="checkbox"/> Support <input type="checkbox"/> Oppose No comment at this time	
Discussion Paper		
The AESO is seeking stakeholder comments regarding the advantages, as well as any other advantages and disadvantages the stakeholder believes are appropriate for the EPC Alternative.		
Stakeholder	Stakeholder Comment	
	<input type="checkbox"/> Support <input type="checkbox"/> Oppose Comments on AESO's stated advantages and disadvantages re EPC Alternative:	



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	<ul style="list-style-type: none"> • This model would very likely introduce additional costs to customers in the long term. This proposal addresses some of the complexities of leveling the competition for the facilities between incumbent TFOs and new entrants by making TFO resources for long term operations and maintenance available. However, the more creative a respondent is in their design, the more likely that there will be additional costs for O & M long term. TFOs standardize so that costs associated with sparing, training, development of maintenance routines and procedures can be optimized and TFO designs are integral and linked to TFO operations and maintenance practices. • Standardization of design is also one of the ways in which we manage safety. Anytime unique designs are out there and require different work methods our staff is exposed to a higher risk. The ability to safely maintain facilities is something that is engineered into the facilities we build. <p>Other Disadvantages:</p> <ul style="list-style-type: none"> • Departure from traditional role of AESO who 	
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	<p>must be positioned, in short order, to put processes in place to evaluate an EPC bid process and accept various responsibilities with respect to the EPC contract</p> <ul style="list-style-type: none"> • Greatly increased AESO workload, responsibilities and staffing requirements will lead to additional customer costs • AESO, as the counter-party to the EPC contract, would be assuming accountability to customers for project cost and schedule deliverables as well as associated legal liabilities for contract performance. • Less visibility of costs in an EPC model than in an EPCM model • Risk of communication and transition issues between EPC and TFO, which AESO would have to understand and manage • Right of-Way planning – potential customer issues which are transferred to TFO and over which TFO had no direct control to manage and mitigate because of no decision-making authority; this limits the TFO’s ability to influence a positive outcome • First Nations Relationships is an ongoing function which requires significant time, effort and understanding to maintain; not a function which can be readily assumed or outsourced 	
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Discussion Paper		
The AESO is seeking stakeholder comments regarding additional issues for consideration applicable to the Own and EPC Alternatives, as well as identification of any other issues that will need consideration.		
Stakeholder	Stakeholder Comment	
	<input type="checkbox"/> Support <input type="checkbox"/> Oppose <p>This section raises several questions on various issues, some of which could be dealt with contractually. We would suggest a more complete list be developed and dealt with once a preferred model is recommended to avoid a piecemeal, and possibly unbalanced, approach to solutions.</p>	
Discussion Paper		
The AESO is seeking stakeholder comments regarding additional issues for consideration applicable to the Own Alternative, as well as identification of any other issues that will need consideration.		
Stakeholder	Stakeholder Comment	
	<input type="checkbox"/> Support <input type="checkbox"/> Oppose <p>This section raises several questions on various issues, some of which could be dealt with contractually. We would suggest a more complete list be developed and dealt with once a</p>	



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	preferred model is recommended to avoid a piecemeal, and possibly unbalanced, approach to solutions.	
Discussion Paper		
The AESO is seeking stakeholder comments on the inclusion of the proposed structure for the Request for Qualifications (RFQ), as well as any other information the stakeholder believes should be included.		
Stakeholder	Stakeholder Comment	
	<input type="checkbox"/> Support <input type="checkbox"/> Oppose No comment at this time.	
Discussion Paper		
The AESO is seeking stakeholder comments on the inclusion of the information required by potential bidders to substantiate their qualifications to an RFQ, as well as any other information the stakeholder believes should be included.		
Stakeholder	Stakeholder Comment	
	<input type="checkbox"/> Support <input type="checkbox"/> Oppose No comment at this time.	
Discussion Paper		
The AESO is seeking stakeholder comments on the potentially required amendments to relevant regulations, as well as any other amendments the stakeholder believes will be necessary.		



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Stakeholder	Stakeholder Comment	
	<input type="checkbox"/> Support <input type="checkbox"/> Oppose <p style="color: blue;">It might be advisable to wait until a preferred model is selected before determining what, if any, regulations need to change.</p>	
Discussion Paper		
<p>The AESO is seeking any other stakeholder comments on the Discussion Paper concerning the AESO's proposed competitive procurement process.</p>		
Stakeholder	Other Stakeholder Comments: <p style="color: blue;">1) Critical implementation issues and proposal resolution – need clarity around resolution process ... what stakeholder input is solicited and how is resolution achieved prior to submission to AUC.</p> <p style="color: blue;">2) Under Section 1.1 P3 – regarding thorough analysis required, Footnote 4 references the collection of information from other jurisdictions. This information needs to be shared with and understood by stakeholders. As such the following suggestions are made:</p> <ul style="list-style-type: none"> • AESO should organize a session (by video 	



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	<p>link in the interest of time and costs) inviting representatives of other jurisdictions (including regulatory bodies and utilities) who have attempted or are attempting to make similar changes to make presentations on their jurisdiction’s process, current status, findings, lessons learned, problems encountered and how they were resolved, etc. and to be available to answer questions. All registered stakeholders involved in the Alberta process would be invited to attend and participate. This is seen as a logical step to assist Alberta to understand what could go wrong and to ensure that adequate protection is put in place before making significant changes and possibly risking unintended consequences or rework.</p> <ul style="list-style-type: none"> • AESO should engage an independent consultant to comment and provide advice on Alberta’s proposed changes. <p>ATCO Electric’s preliminary research of the experience and directions in other jurisdictions suggests these initiatives are not yet fully operating models and may not necessarily be applicable to Alberta due to their narrow scope, i.e. these other jurisdictions are not attempting</p>	
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	<p>to apply their concepts to anything near the magnitude and complexity of CTI.</p> <p>With respect to the three jurisdictions cited – Ontario, UK and Texas – the “competitive” process is applicable only to connecting renewables (largely wind) and not to any critical backbone grid elements.</p> <p>In these three jurisdictions, the processes either have not been implemented or in early stages of implementation or acceptance as a viable market model.</p> <p>It would be instructive to Alberta to have a full understanding and take advantage of any other experience in competitive transmission models.</p>	
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