

**AESO Discussion Paper – Alberta Demand Response Initiatives
Stakeholder Comment Matrix**

Section	Subsection	Stakeholder Response
<p>2.0 Demand Response Policy and Background</p>	<p>2.3 Demand Response Principles</p> <ul style="list-style-type: none"> a. Remove Barriers b. Symmetric Rules c. Product Design d. Price Fidelity 	<p>ATCO Power is elated with the approach the AESO has taken with the Alberta Demand Response Initiative Discussion Paper. We believe very strongly that every discussion paper should start with an exploration of principles. We commend the AESO for providing a fulsome discussion paper that includes principles and then relates back to the principles throughout the paper. We would like to see the AESO continue with this approach for all AESO initiatives.</p> <p>We agree with the AESO’s key principle that demand response must be consistent with the concept of a FEOC market. ATCO Power supports the AESO’s interpretation of the principles that should be included in order to ensure a FEOC design to demand response.</p> <p>In product design, the AESO states “[a] related principle is that, where possible, products will not be created based on the cause of a system problem, but rather on the action that is required to resolve the problem. We support this principle but are concerned with the wording ‘where possible’. We would appreciate the AESO elaborating on how circumstances that do not conform to the principle would be handled and how likely this scenario is to occur.</p>
<p>3.0 Energy Market Initiatives</p>	<p>3.2 Barriers to more DR in the Energy Market</p> <ul style="list-style-type: none"> a. Are the barriers identified actually barriers? 	

	b. Are there missing barriers?	
3.3 Options to Increase DR in the Energy Market	3.3 Options to Increase DR in the Energy Market a. Other options beyond those identified in sections 3.3.1 through 3.3.4?	
	3.3.1 Price Certainty a. Payments to bids on the margin b. Altering settlement rules c. New products d. Others to add?	ATCO Power agrees with the AESO that loads must submit a bid into the market and comply with dispatch instructions in order to receive a payment for bids on the margin.
	3.3.2 Insufficient Incentive a. Pay loads for the benefits they create b. Pay loads the energy price c. Allow bids >\$1000/MWh d. Others to add?	ATCO Power strongly agrees with the AESO that curtailment decisions in the energy market should be made on the basis of internal decision making by loads.
	3.3.3 Aggregation and Baseline Methodology	
	3.3.4 Signals Beyond the Spot Energy Price	ATCO Power agrees with the AESO that it does not have a mandate to participate in the market for the purpose of managing market outcomes.
4.0 Reliability Product Initiatives	4.2 Barriers to more DR participation in Reliability Products a. Are the barriers identified actually barriers? b. Are there missing barriers?	
	4.3.1 New Products a. Ramping (wind following) product	

	<ul style="list-style-type: none"> b. Voluntary load curtailment c. Transmission must run (TMR) 	
	4.3.2 Aggregators	
	4.3.3 Technical Standards <ul style="list-style-type: none"> a. Supplemental Reserves b. Spinning Reserves 	
5.0 Other Products	5.1 Generator Outage Coordination and Rescheduling	ATCO Power would prefer an in-market solution over an out-of-market solution. We support the competitive compensation of a willing participant over conscription.
	5.2 Long Lead Time Energy	
	5.3 Dispatch Down Service	
	5.4 Load Shed Service	ATCO Power is concerned with how LSS will be distinguished for reliability purposes versus market purposes (import and export capacity). These are two very different products. ATCO Power would like the AESO to address in their recommendation paper on increasing intertie capacity how increased capacity can be achieved fairly and efficiently in a FEOC LSSi design for market purposes.
6 Conclusions and Next Steps		

