

Stakeholder Comment Matrix

Development of a Proposed Amended ISO rule – Section 501.3 of the ISO rules, *Abbreviated Needs Approval Process*



<p>Period of Comment: September 1, 2021 through October 6, 2021</p> <p>Comments From: ENMAX Power Corporation</p> <p>Date: 2021/10/08</p>	<p>Contact: Mark McGillivray</p> <p>Phone:</p> <p>Email: MMcGillivray@enmax.com</p>
--	--

Instructions:

1. Please fill out the section above as indicated.
2. Please refer back to the “related material” on the Stakeholder Engagement page on the AESO website.
3. Please respond to the questions below and provide your specific comments, if any. Blank boxes will be interpreted as favourable comments.

The AESO is seeking comments from Stakeholders on the development of proposed amended ISO rule Section 501.3, Abbreviated Needs Approval Process (“Section 501.3”), with regard to the following matters:

	Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
1.	Do you agree that the issue identified in the letter of notice requires the proposed development of amended Section 501.3? If not, why not?	Agree.
2.	Do you agree with the potential purpose of the proposed development of amended Section 501.3? If not, why not?	Yes, ENMAX Power Corporation (EPC) agrees that the existing Abbreviated Needs Approval Process (ANAP) eligibility criteria is too stringent and there is room for improvement to create additional regulatory efficiencies. See response to Question 4.
3.	Do you agree with the proposed consultation and timelines? If not, why not?	See response to Question 4. Further consultation is required, and the timeline should be adjusted accordingly.



<p>4.</p>	<p>Do you agree with the proposed amended Section 501.3? If not, why not?</p>	<p>EPC does not agree with the proposed amended Section 501.3, specifically Section 3 – Eligibility Assessment.</p> <p>Based on the AESO’s proposal, it appears the ANAP would now include transmission system development projects, specifically Point of Delivery (POD) substation projects that are more significant by way of cost and impact to the Alberta Interconnected Electric System (AIES).</p> <p>In EPC’s view, the ANAP is intended to allow the AESO the ability to approve projects that have a minor impact on the AIES and therefore improve regulatory efficiency for industry. While EPC appreciates the AESO’s efforts to reduce regulatory burden, the proposed amendment appears to remove the AUC, acting as a check and balance, from the approval process for the majority of connection projects, which EPC does not support.</p> <p>Given that, since 2015, a small portion of projects have been eligible for approval under the existing ANAP eligibility criteria, EPC is of the view that there is room to capture a larger portion of connection projects moving forward.</p> <p>With respect to the eligibility assessment proposed in Section 3 (c), EPC requires more information to make an informed opinion on the threshold amounts being proposed. Answers to the following two questions would be helpful in understanding the impacts of the new threshold amounts: (i) How many additional projects, based on historical applications from July 1, 2015, would have met the new threshold eligibility criteria, had the new proposed thresholds been in place? (ii) How many additional projects, based on historical applications from July 1, 2015, would qualify for the abbreviated process if the threshold amounts were \$10 million and \$8 million respectively? EPC would like to ensure that the policy revisions achieve a balance between regulatory efficiency while allowing the AUC to remain in a position to approve projects that have a more significant cost and impact to the AIES.</p> <p>Within the EPC system, POD substation projects are planned by the DFO, and are proposed to provide service to distribution customers. Projects are planned to maintain a level of service based on the DFO’s reliability criteria and that align with longer term distribution plans in response to distribution load connections. The AESO does not have the mandate to plan the distribution system nor provide service to distribution customers. Based on this, EPC believes the ANAP and AESO influence should be limited to POD substation development projects that have a minor impact on the AIES.</p>
-----------	---	---

Stakeholder Comment Matrix

Development of a Proposed Amended ISO rule – Section 501.3 of the ISO rules, *Abbreviated Needs Approval Process*



	Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
5.	Do you have any additional comments?	None at this time.