

# Stakeholder Comment Matrix and AESO Replies

Request for Feedback 2021 Budget Review Process (BRP) Invitation and Process Materials | July 7, 2020



The AESO asked market participants and interested stakeholders to participate in the AESO’s consultation regarding its 2021 Business Plan and Budget. Related stakeholder comments regarding the invitation and supporting material are provided in the following matrix. The matrix also includes AESO’s replies to the stakeholder comments.

I. Invitation to Participate	
Do stakeholders accept the invitation to participate in the 2021 BRP?	
1. Alberta Direct Connect Consumers Association (“ADC”)	ADC appreciates the opportunity to participate in the 2021 BRP
2. AltaLink Management (“Altalink”)	Yes
3. Best Consulting Solutions Inc. (“BCSI”)	Yes, BCSI appreciates and accepts the invitation to participate in the BRP
4. Capital Power Corporation (“Capital Power”)	Capital Power appreciates the opportunity to participate in the 2021 Budget Review Process and accepts the AESO invitation.
5. ENMAX Corporation (“ENMAX”)	ENMAX intends to participate in the AESO’s 2021 Budget Review Process (BRP).
6. Greengate Power Corporation (“Greengate”)	Greengate appreciates and accepts the AESO’s offer to take part in the 2021 BRP.
7. Heartland Generation Ltd. (“Heartland Generation”)	Yes, Heartland Generation will participate in the BRP.
8. Industrial Power Consumers Association of Alberta (“IPCAA”)	Yes
9. Industrial Power Producers Society of Alberta (“IPPSA”)	Yes, IPPSA appreciates the invitation and looks forward to participating in the BRP.

I. Invitation to Participate (cont.)	
Do stakeholders accept the invitation to participate in the 2021 BRP?	
<b>10. Reactive Technologies Ltd, UK (“Reactive Technologies”)</b>	Yes
<b>11. The Office of The Utilities Consumer Advocate (“UCA”)</b>	The Office of the Utilities Consumer Advocate (UCA) has regularly participated in the AESO’s annual Budget Review Process (BRP) in the past and plans to do so this year as well. Hence, the UCA accepts the AESO’s invitation to participate in the 2021 BRP.
<b>12. TransAlta Corporation (“TransAlta”)</b>	Yes, TransAlta accepts the invitation to participate in the 2021 BRP.
<b>13. Voltus Energy Canada, Ltd. (“Voltus Energy”)</b>	Yes
<b>AESO Response</b>	<ul style="list-style-type: none"> <li>• All comments noted.</li> <li>• The Alberta Electric System Operator (“AESO”) thanks stakeholders for their participation, commitment and support of the process.</li> </ul>

II. Terms of Reference	
Do stakeholders agree with or have comments on the principles set out in the Terms of Reference?	
<b>1. Alberta Direct Connect Consumers Association (“ADC”)</b>	ADC supports the principles set out in the terms of reference
<b>2. AltaLink Management (“Altalink”)</b>	n/a
<b>3. Best Consulting Solutions Inc. (“BCSI”)</b>	<p>BCSI suggests the AESO might consider the following addition to recognize the current virtual environment:</p> <ul style="list-style-type: none"> <li>• During stakeholder meetings, verbal comments are encouraged as they provide valuable input for general discussion and consideration. <b>Given that the BRP will be conducted via webinar and not in person, extra effort will be applied by the AESO to ensure participants have opportunity to make verbal comments.</b></li> </ul>
<b>4. Capital Power Corporation (“Capital Power”)</b>	Capital Power agrees with the principles set out in the Terms of Reference.
<b>5. ENMAX Corporation (“ENMAX”)</b>	The Terms of Reference appear reasonable.
<b>6. Greengate Power Corporation (“Greengate”)</b>	Greengate agrees with the principles outlined in the terms of reference.
<b>7. Heartland Generation Ltd. (“Heartland Generation”)</b>	<p>Yes, Heartland Generation agrees with the principles outlined in the Terms of Reference. Heartland Generation thinks that it is especially important that the written decision rendered by the AESO Board on these matters contain detailed reasons and rationale. Should the AESO not agree with stakeholder feedback, Heartland Generation suggests that these reasons should specifically explain why the AESO does not agree.</p> <p>Heartland Generation is willing to sign a non-disclosure agreement if that would facilitate the sharing of more complete information between the AESO and those stakeholders in the BRP process.</p>

II. Terms of Reference (cont.)	
Do stakeholders agree with or have comments on the principles set out in the Terms of Reference?	
<b>8. Industrial Power Consumers Association of Alberta (“IPCAA”)</b>	Yes – agree. No comments at this time.
<b>9. Industrial Power Producers Society of Alberta (“IPPSA”)</b>	IPPSA supports the Terms of Reference provided.
<b>10. Reactive Technologies Ltd, UK (“Reactive Technologies”)</b>	We agree with, we do not have comments on the principles.
<b>11. The Office of The Utilities Consumer Advocate (“UCA”)</b>	While the UCA generally agrees with the principle of transparency as outlined in the Terms and Reference, the UCA believes that the consultation should be meaningful and not just formal.
<b>12. TransAlta Corporation (“TransAlta”)</b>	We support and agree with the principles set out in the Terms of Reference.
<b>13. Voltus Energy Canada, Ltd. (“Voltus Energy”)</b>	Yes

II. Terms of Reference (cont.)	
Do stakeholders agree with or have comments on the principles set out in the Terms of Reference?	
<p><b>AESO Response</b></p>	<ul style="list-style-type: none"> <li>• All comments noted.</li> <li>• The AESO values verbal discussion and will ensure stakeholders have opportunities to make verbal comments during the sessions as per the BRP Terms of Reference.</li> <li>• The AESO will consider providing additional rationale in the written Decision by the AESO Board and in its responses when not in alignment with stakeholder comments. A non-disclosure agreement would not be required as the AESO wants the rationales to be transparent and available to all market participants and interested parties, not just a BRP participant.</li> <li>• As per the AESO's <i>Stakeholder Engagement Framework</i>, the AESO's stakeholder engagement approach is conducted strategically and in a coordinated manner such that we are compliant with our legislative and regulatory obligations, and stakeholders are provided with a consistent and meaningful experience to help us make well-informed decisions for the benefits of Albertans.</li> </ul>

III. Process Steps	
Do stakeholders agree with or have comments on the steps identified in the 2021 BRP? <i>Note: An additional meeting regarding Business Initiatives added to this year's process cycle</i>	
<b>1. Alberta Direct Connect Consumers Association (“ADC”)</b>	ADC supports the steps identified in the 2021 BRP.
<b>2. AltaLink Management (“Altalink”)</b>	n/a
<b>3. Best Consulting Solutions Inc. (“BCSI”)</b>	BCSI questions if either of the Industry Roundtables will be involved in the BRP, or have input into the BRP, and if so, should that be recognized in the process steps.
<b>4. Capital Power Corporation (“Capital Power”)</b>	Capital Power supports the inclusion of an additional meeting to discuss the AESO’s Business Initiatives. Including AESO leadership in this process step to speak to the initiatives will ensure there is constructive dialogue with stakeholders. This will be a positive addition to the 2021 BRP process.
<b>5. ENMAX Corporation (“ENMAX”)</b>	At this time, ENMAX does not have any comments on the steps identified in the 2021 BRP.
<b>6. Greengate Power Corporation (“Greengate”)</b>	Greengate agrees with the steps outlined in the 2021 BRP document. Greengate believes that the initial meeting regarding the business initiatives will be helpful in creating an understanding with stakeholders on the AESO’s proposed key initiatives.
<b>7. Heartland Generation Ltd. (“Heartland Generation”)</b>	Heartland Generation does not have any comments at this time
<b>8. Industrial Power Consumers Association of Alberta (“IPCAA”)</b>	Yes – agree. No comments at this time.
<b>9. Industrial Power Producers Society of Alberta (“IPPSA”)</b>	IPPSA greatly appreciates and supports the inclusion of the new step in the process, which enables a discussion of the AESO’s key initiatives with relevant AESO vice presidents. This will help stakeholders better understand what the AESO proposes for the year ahead and will help in rationalizing its priorities.

III. Process Steps (cont.)	
Do stakeholders agree with or have comments on the steps identified in the 2021 BRP? <i>Note: An additional meeting regarding Business Initiatives added to this year's process cycle</i>	
<b>10. Reactive Technologies Ltd, UK (“Reactive Technologies”)</b>	We agree with and do not have comments on the steps.
<b>11. The Office of The Utilities Consumer Advocate (“UCA”)</b>	The UCA has no comments regarding the steps outlined in this year's BRP.
<b>12. TransAlta Corporation (“TransAlta”)</b>	We support the addition of the meeting regarding the business initiatives. We commend the AESO for amending their process from 2020 in light of the stakeholder comments that were made about the need for more information and justification of the business initiatives that the AESO presents in its BRP.
<b>13. Voltus Energy Canada, Ltd. (“Voltus Energy”)</b>	We agree with the steps identified in the 2021 BRP, and appreciate the opportunity to weigh in on business initiatives development earlier in the process.
<b>AESO Response</b>	<ul style="list-style-type: none"> <li>• All comments noted.</li> <li>• The industry roundtables are separate processes, however, like other AESO processes there will be coordinated alignment between processes and the BRP where possible.</li> <li>• Thank you for your support for the additional meeting regarding business initiatives and for the stakeholder feedback and support during last year's process that prompted the AESO to amend the BRP timing and process to accommodate this additional meeting. AESO leadership will be participating in both business initiative meetings (August 11 and September 21).</li> </ul>

IV. Calendar and Schedule	
Do stakeholders agree with the proposed BRP stakeholder calendar and schedule? Are there any comments regarding the meetings scheduled?	
<b>1. Alberta Direct Connect Consumers Association (“ADC”)</b>	Does the AESO anticipate all of the meetings including the AESO Board presentations will be held virtually? Or will there be an option to accommodate virtual attendance for those not able to attend in person?
<b>2. AltaLink Management (“Altalink”)</b>	n/a
<b>3. Best Consulting Solutions Inc. (“BCSI”)</b>	<p>BCSI suggests that the AESO consider combining the following two activities onto one date. They are only separated by a long weekend and having two postings so close together could lead to confusion/overload.</p> <ul style="list-style-type: none"> <li>• Post AESO replies to written comments on invitation and process materials (Step 1) July 31</li> <li>• And “Post materials for Business Initiatives Stakeholder Meeting 1 (Step 2) August 4</li> </ul>
<b>4. Capital Power Corporation (“Capital Power”)</b>	Capital Power agrees with the proposed schedule of meetings and has no additional comments
<b>5. ENMAX Corporation (“ENMAX”)</b>	The proposed BRP stakeholder calendar and schedule appear reasonable. Depending on the forum used for future meetings, stakeholder engagement and dialogue may continue to be limited. The AESO may need to adjust their schedule or provide a workaround to ensure stakeholders have a reasonable opportunity to provide feedback and ask questions on the content being presented.
<b>6. Greengate Power Corporation (“Greengate”)</b>	Greengate has no comments and agrees on the stakeholder calendar and schedule.
<b>7. Heartland Generation Ltd. (“Heartland Generation”)</b>	The schedule appears reasonable. Heartland Generation does not have any further comments at this time.



IV. Calendar and Schedule (cont.)	
Do stakeholders agree with the proposed BRP stakeholder calendar and schedule? Are there any comments regarding the meetings scheduled?	
<b>8. Industrial Power Consumers Association of Alberta (“IPCAA”)</b>	IPCAA has no immediate concerns with the proposed calendar.
<b>9. Industrial Power Producers Society of Alberta (IPPSA)</b>	IPPSA supports the calendar as proposed.
<b>10. Reactive Technologies Ltd, UK (“Reactive Technologies”)</b>	Yes. No comments on the meetings schedules.
<b>11. The Office of The Utilities Consumer Advocate (“UCA”)</b>	The UCA has no concerns regarding the steps outlined in this year’s calendar or schedule.
<b>12. TransAlta Corporation (“TransAlta”)</b>	The proposed BRP stakeholder calendar and schedule provide reasonable amounts of time between process steps and should facilitate adequate stakeholder engagement.
<b>13. Voltus Energy Canada, Ltd. (“Voltus Energy”)</b>	Yes, no comments.

**IV. Calendar and Schedule (cont.)**

Do stakeholders agree with the proposed BRP stakeholder calendar and schedule? Are there any comments regarding the meetings scheduled?

**AESO Response**

- All comments noted.
- At this time, the AESO has not determined if the AESO Board stakeholder meetings, and future BRP meetings, will be held virtually or in person, nevertheless, there will be an option to attend virtually.
- With respect to the posting on July 31 “AESO replies to written comments on invitation and process material”, these stakeholder comments and AESO replies should not provide a significant review burden for stakeholders as they are process related comments. The August 4 “materials for Business Initiatives Stakeholder Meeting 1”, stakeholders will have five business days to review the documents (prior to the meeting). The stakeholders will have the opportunity to provide comments based on this first meeting and the presentation by August 27. With starting the process earlier, there is additional time for review and discussion and there will be many opportunities throughout the process to provide comments.
- The AESO will ensure stakeholders have a reasonable opportunity to provide feedback and ask questions on the content being presented.

V. Other Comments	
Do stakeholders have any other comments to offer at this time?	
<b>1. Alberta Direct Connect Consumers Association (“ADC”)</b>	No other comments at this time.
<b>2. AltaLink Management (“Altalink”)</b>	n/a
<b>3. Best Consulting Solutions Inc. (“BCSI”)</b>	No further comments
<b>4. Capital Power Corporation (“Capital Power”)</b>	Capital Power has no additional comments at this time.
<b>5. ENMAX Corporation (“ENMAX”)</b>	ENMAX would expect that the AESO’s 2021 Budget will evolve based on the cost-benefit for each of its proposed initiatives. Given the economic climate, reducing costs to market participants and ensuring initiatives are reflective of market needs should remain a priority for the AESO.
<b>6. Greengate Power Corporation (“Greengate”)</b>	Greengate is concerned over the lack of current loss factor analysis available to project developers. Greengate would recommend that some form of loss factor analysis be available to developers well prior to the project coming into service. Greengate looks forward to AESO initiatives regarding loss factor developer analysis.
<b>7. Heartland Generation Ltd. (“Heartland Generation”)</b>	n/a
<b>8. Industrial Power Consumers Association of Alberta (“IPCAA”)</b>	n/a

V. Other Comments (cont.)	
Do stakeholders have any other comments to offer at this time?	
<b>9. Industrial Power Producers Society of Alberta (“IPPSA”)</b>	IPPSA thanks the AESO for the opportunity to comment within its Budget Review Process and we appreciate the process change to allow for dialogue with AESO’s vice presidents. IPPSA’s interest in the Budget Review Process is to look for opportunities to rationalize AESO priorities and to reduce the trading charge. The AESO’s 2020 trading charge is the highest its ever been, which comes at a challenging time for the AESO’s customers.
<b>10. Reactive Technologies Ltd, UK (“Reactive Technologies”)</b>	We are interested in engaging with AESO in a meaningful discussion about the statement made that “Available Transfer Capability will potentially be reduced in response to low system inertia, the reduced ATC will be established based on real-time inertia calculations.” We can’t see directly projects that will measure or increase inertia in the budget for 2021 and were wanting to discuss and engage with the right people on this matter.
<b>11. The Office of The Utilities Consumer Advocate (“UCA”)</b>	With respect to a number of other stakeholder sessions, the AESO recently changed its mind regarding decisions that were originally established based on information and principles presented at the beginning of the consultation. The UCA would like to reiterate that the outcome of the BRP should be driven by the discussion and concerns raised during the consultation.
<b>12. TransAlta Corporation (“TransAlta”)</b>	No additional comment at this time.
<b>13. Voltus Energy Canada, Ltd. (“Voltus Energy”)</b>	No.

V. Other Comments (cont.)	
Do stakeholders have any other comments to offer at this time?	
<p><b>AESO Response</b></p>	<ul style="list-style-type: none"> <li>• All comments noted.</li> <li>• As the organization responsible for managing the safe, reliable and economic operation of the provincial power system, the AESO is committed to doing what we can within our mandate to enable Alberta's future prosperity. The AESO has already actioned several near-term cost management initiatives and will continue to work with the Government of Alberta and industry to identify longer-term opportunities to put downward pressure on costs and to reduce red tape and regulatory burden. For more information related to cost management and the AESO, please see <a href="https://www.aeso.ca/aeso/cost-management/">https://www.aeso.ca/aeso/cost-management/</a></li> <li>• The concern noted above regarding loss factor analysis (being available prior to coming into service for project developers) will be shared with the applicable AESO area and the AESO leadership. You are also encouraged to continue to actively and directly work with the applicable AESO area and their respective processes.</li> <li>• With respect to the comment above regarding ATC, upon receiving this request, the AESO has connected you with applicable AESO areas.</li> </ul>