

Stakeholder Comment Matrix – Sept. 24, 2020

Bulk and Regional Tariff Design Session 2



Period of Comment: Sept. 24, 2020 through Oct. 8, 2020	Contact: Hao Liu/Rob Senko
Comments From: AltaLink Management Ltd.	Phone: 403-710-1247/403-874-6762
Date: [20201008]	Email: Hao.liu@altalink.ca/rob.senko@altalink.ca

Instructions:

1. Please fill out the section above as indicated.
2. Please respond to the questions below and provide your specific comments.
3. **Please submit one completed evaluation per organization.**
4. Email your completed comment matrix to tariffdesign@aeso.ca by **Oct. 8, 2020**.

The AESO is seeking comments from Stakeholders with regard to the following matters:

	Questions	Stakeholder Comments
1.	Please comment on Session 2 hosted on Sept. 24, 2020. Was the session valuable? Was there something the AESO could have done to make the session more helpful?	The September 24, 2020 session was valuable as the AESO made it clear it was moving away from 12-CP for recovering bulk system costs and provided some straw-dog bookend rate options for stakeholders to discuss/debate. It would have been useful to have made some of the analysis available that the AESO relied upon for their slides to stakeholders in the meeting. However, the AESO's technical session on October 14, 2020 will help provide stakeholders a better understanding of the AESO's bookends A and B and the resulting rate impacts.
2.	Are you supportive of the proposed engagement approach for the AESO's Bulk and Regional Tariff Design? Why or why not? Please be as specific as possible.	AltaLink is supportive of the AESO's proposed engagement approach for its Bulk and Regional Tariff Design.
3.	Do you support the AESO's perspective that 12-CP (status quo) is not a reasonable continued outcome of the Bulk and Regional Tariff Design? Please be as specific as possible.	AltaLink supports the AESO's perspective that 12-CP (status quo) is not a reasonable continued outcome of the Bulk and Regional Tariff Design. In AltaLink's opinion and confirmed by the AESO during its stakeholder sessions, 12-CP did very little to defer or mitigate transmission costs. By reviewing the AESO's most recent long-term plan, the majority of the costs are associated with transmission facilities to be constructed for generation. Therefore, sending a system-wide signal to loads, such as 12-CP, will do little to defer or reduce the costs associated with future load driven transmission projects.

	Questions	Stakeholder Comments
4.	<p>Are the AESO's bookends A and B reasonable starting points for the Bulk and Regional Tariff Design, considering future determination of modifications and mitigation? Why or why not? Please be as specific as possible.</p>	<p>AltaLink agrees with the AESO's bookend A being one bookend as it looks to recover all of the bulk system costs by way of a fixed charge which is very different from the current ISO tariff. Bookend B, in AltaLink's opinion is just another alternative that still uses CP to recover bulk system costs. Given the inherent weakness of CP, an alternate bookend would be to not use CP at all, but a different price signal – many of which were set out in later slides. Both bookends could include more localized incentives to defer or mitigate transmission facility costs in combination with fixed costs and other rates.</p>
5.	<p>Are their considerations or objectives relating to energy storage tariff treatment that you feel the AESO has missed? If yes, please describe and be as specific as possible.</p> <p>Do you have additional clarifying questions that need to be answered to support your understanding?</p>	<p>At the beginning of the meeting the AESO stated the tariff needs to change to reflect and adapt to different generation facilities that are connecting to the grid as well as the evolution of new technologies. As energy storage is a unique technology that can be used in a number of different applications, the AESO needs to recognize this when developing a tariff to charge for this technology when utilizing the transmission system.</p>
6.	<p>Additional comments</p>	<p>To reiterate AltaLink's comment at the meeting, there should be one dedicated session with stakeholders to discuss and determine feasible mitigation strategies for customers that are adversely affected by moving away from 12-CP to another bulk system cost recovery methodology. Stakeholders/customers that will be affected by a prospective rate methodology change may be more willing to discuss other potential rate options if they know there is agreement on a feasible mitigation strategy.</p>

Thank you for your input. Please email your comments to: tariffdesign@ieso.ca.