

Stakeholder Comment Matrix – Dec. 19, 2019
Request for feedback on 2020 plan for market-related initiatives



<p>Period of Comment: Dec. 19, 2019 through Jan. 17, 2020</p> <p>Comments From: The Cogeneration Working Group is comprised of the following members: Canadian Natural Resources Limited; Cenovus Energy Inc.; Dow Chemical Canada ULC; Imperial Oil Resources Limited; Inter Pipeline Ltd.; Lafarge Canada Inc.; MEG Energy Corp.; Suncor Energy Inc.; Syncrude Canada Ltd.; TC Energy Ltd. This submission represents the consensus view of the group and is submitted on behalf of the group by Power Advisory LLC. Individual member companies may also make independent submissions.</p> <p>Date: 2020/01/17</p>	<p>Contact: [REDACTED]</p> <p>Phone: [REDACTED]</p> <p>Email: [REDACTED]</p>
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The AESO is seeking comments from stakeholders on its 2020 Plan for Market-Related Initiatives.

	Questions	Stakeholder Comments
1.	Is the publication of the <i>2020 Plan for Market-Related Initiatives</i> useful to you? Would any additional information be helpful? Please be specific.	<p>The publication of the 2020 plan is helpful for planning workflow and resourcing.</p> <p>A rolling potential workplan for the next 3 years, published annually, would generally be helpful both to identify priorities and for the industry to understand future evolution.</p> <p>It would also be helpful if the AESO could provide rationale regarding why items it chooses to address in 2020 are, in fact, AESO priorities. The workplan is aggressive and if it is necessary to prioritize and delay or eliminate some items, it will be helpful to understand the drivers behind the plan.</p>
2.	Are there any additional market-related initiatives that in your view require the AESO's and stakeholders' attention in 2020 that are not listed in the <i>2020 Plan for Market-Related Initiatives</i> ?	The current proposal appears to be aggressive. Accordingly, the CWG does not propose to add any items to the list.

3.	<p>Do you have suggested changes to the timing of initiatives in the <i>2020 Plan for Market-Related Initiatives</i> schedule? If yes, please be specific to why you would like to see the timing changed and what the suggested timing should look like.</p>	<p>Dispatch tolerance changes and a ramp table submission are no longer required given the cancelation of the capacity market. During the capacity market consultation, the AESO indicated that the current rules are effective, but the capacity market created potential risk the rules would no longer be sufficient. With the capacity market cancellation, there does not appear to be a driver for these changes. The AESO can and should monitor the need for tighter dispatch tolerances, but absent an identified issue there is no need to change the rules today to manage an issue that does not exist at this time.</p> <p>The CWG agrees the mothball rule is a priority for 2020, but suggests that the AESO should start engaging with industry immediately. This rule may overlap with a range of market rules and has the potential to impact a large number of participants with different types of assets. It is important the AESO gather these views as early in the process as possible and prior to developing options.</p> <p>Regarding Price Cap, Price Floor and Shortage Pricing, the AESO should involve stakeholders before sending a report to government in May. Stakeholders should be made aware of the direction for market power mitigation prior to this consultation phase if possible, in order to inform views on the appropriate direction for price cap and scarcity pricing issues.</p>
4.	<p>Do you have any other suggestions or comments you would like to share with the AESO related to the <i>2020 Plan for Market-Related Initiatives</i> publication?</p>	<p>The CWG supports the AESO's approach to provide direction for the year, and reiterates that a longer-term workplan would be valuable as well. It would be beneficial to understand the drivers and order of priorities as part of this and future workplans.</p> <p>The CWG also notes that it would be valuable for stakeholders to receive reports on key findings and status updates during each consultation process in order to continue transparent communications.</p>

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