

# Stakeholder Comment Matrix – Feb. 6, 2020

Local Interconnection Costs for DFOs (Substation Fraction) and DFO Cost Flow-Through



<b>Period of Comment:</b> Feb. 6, 2020 through Feb. 13, 2020 <b>Comments From:</b> Lionstooth Energy <b>Date:</b> 2020/02/13	<b>Contact:</b> [REDACTED] <b>Phone:</b> <b>Email:</b> [REDACTED]
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**Instructions:**

1. Please fill out the section above as indicated.
2. Please respond to the questions below and provide your specific comments.
3. Email your completed comment matrix to [tariffdesign@aeso.ca](mailto:tariffdesign@aeso.ca) by **Feb. 13, 2020**.

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

	Questions	Stakeholder Comments
1.	Please comment on the proposed agenda	<p>Here are Lionstooth Energy’s (Lionstooth’s) comments on the Session 1 agenda:            Overview of Engagement Process:</p> <ul style="list-style-type: none"> <li>• We suggest that the clarity on the process steps be provided in addition to stakeholder expectations, including the “products” that will be produced as part of the engagement, whether this is minutes for technical sessions, rounds of request for written comment, or even the final product “report to the AUC”.</li> <li>• Given the interdependencies of some of the topics for discussion, we would support the AESO reviewing what is out of scope for this engagement, including what would and should be discussed under in the Tariff Design Advisory Group (TDAG) scope or as part of future rate proceedings (i.e. 2018 ISO Tariff Compliance Filing, 2020 ISO Tariff application, or DFO Phase II applications). For example, 12 CP is out of scope for this engagement.</li> </ul> <p>Level-setting: Getting to a common understanding:</p> <ul style="list-style-type: none"> <li>• In addition to the items identified in the agenda, Lionstooth thinks it will be helpful to define who are the customers impacted by this process. Often our system focuses on load customers as being the only ones impacted by tariff</li> </ul>

		<p>design and market policy. In this case, there is a large customer group, distribution connected generators, that are one of the impacted customers. Recognition of generators as customers is paramount in understanding how tariff and design approaches can impact their businesses.</p> <ul style="list-style-type: none"> <li>The AESO has proposed market participant case studies and has suggested a DFO and DCG example are requested. Lionstooth would like to in fact see two DCG examples, one based on intermittent generation outputs and one based on dispatchable generation (i.e. able to respond to demand or price signals).</li> </ul>
2.	<p>Please comment on the proposed process and session overviews as indicated in the Letter of Notice</p>	<p>In terms of the session process outlined in the notice, Lionstooth offers the following:</p> <ul style="list-style-type: none"> <li>As the AESO is well aware, there is quite a bit of open regulatory and market design processes. Lionstooth appreciates the AESO considering current work loads as well as the need for a timely resolution. We note that the AUC's Distribution System Inquiry has a deadline for written responses in mid-March. Given the overlap in participants in these processes, there could be an issue with the request for proposals by April 2020.</li> <li>We note that the AUC has requested feedback on a series of "foresesable impacts" as part of their consultation on proposed changes to Rule 007 (<a href="https://engage.auc.ab.ca/Rule007">https://engage.auc.ab.ca/Rule007</a>). We are intrigued by this concept and wonder if something similar would help work through some of the longer term or unintended consequences of the outcome of these technical sessions.</li> <li>Some form of evaluation metric may assist in both the development of the proposals as well as provide guidance for Session 3. If these targets, fundamental principles, etc., could be outlined at the onset, it could support a quicker evaluation of proposals later on.</li> </ul>
3.	<p>Additional comments</p>	<p>Lionstooth appreciates the opportunity to provide comment on the agenda and approach proposed by the AESO. It is our hope that this leads to more constructive progress and an outcome that can be provided to the AUC in a timely fashion.</p>

Thank you for your input. Please email your comments to: [tariffdesign@aeso.ca](mailto:tariffdesign@aeso.ca).