

Stakeholder Comment Matrix – June 10, 2020

DER Roadmap



It Date of Request for Comment: <u>June 10, 2020</u>	Contact: <u>[REDACTED]</u>
Period of Consultation: <u>June 10, 2020</u> through <u>July 10, 2020</u>	Phone: <u>[REDACTED]</u>
Comments From: <u>Canadian Renewable Energy Association (CanREA)</u>	Email: <u>[REDACTED]</u>
Date [yyyy/mm/dd]: <u>2020/07/10</u>	

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 stakeholderrelations@aeso.ca by **July 10, 2020**.

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

Question	Answer
Did you identify any content gaps in the <i>DER Roadmap</i> ? If yes, please explain.	<ul style="list-style-type: none"> • AESO defines Distributed Energy Resources as “any distribution connected resource that can potentially supply energy to the electric distribution system.” Given the rightful inclusion of EVs and Energy Storage in the types of DERs CanREA recommends that the definition be amended along the lines of “any distribution connected resource capable of either (1) supplying energy to the electric distribution system, or (2) both supplying and drawing energy from the electric distribution system.” AESO correctly identifies the transformation from one-way to two-way flow, and this should also be included in the definition in recognition of the particular value of storage assets to the energy system in terms of enhancing flexibility and integration of renewables. • Distribution Principles: CanREA supports the principles as outlined on page 9 of the Roadmap document, however, per note below, we recommend that additional Principles should be added to the list, importantly, including investor certainty. • CanREA recommends that the AESO include reference to AUC Bulletin 2020-01 (<i>Exploring market concerns and tariff issues related to self-supply and export reform</i>) and ongoing regulatory engagements in an updated roadmap. The resolution of self-supply reform will have significant and far-reaching implications for future DER growth in the province.

Did you find value in the publication of the *DER Roadmap*? Would any additional information be helpful? How can it be improved?.

- CanREA commends the AESO for having undertaken this project proactively, and in coordination with other workstreams, in order to prepare for a future state of higher penetration of DERs. It is encouraging to see the Roadmap contextualized alongside the 2017 AUC DCG inquiry, the ongoing Distribution System Inquiry, AESO’s parallel Storage Roadmap and Pricing Signal and Cost Allocation workstreams.
 - **Reliability:**
 - **Improved system visibility, data and forecasting:**The Roadmap document outlines a need for increased visibility of DER volumes and location on the distribution system. We strongly support the stated objective of working with DFOs to collect and utilize this information, and to shifting to geographically forecasting DER supply resources separately from gross load to ensure DER are explicit in the forecast. We would further suggest that this information be made available to all market participants, and would encourage discussion on establishing a framework to enable this.
 - **Coordination of system planning:** CanREA strongly supports the commitment to improved coordination of Transmission and Distribution system planning, including through developing a process to facilitate coordination of the AESO’s long-term transmission plans and system NIDs with DFO planning, and aligning DFO DER hosting capabilities with the capability of the transmission system to integrate generation. We would strongly encourage the incorporation of Non-Wires Alternatives within the Tx/Dx Coordinated Planning Framework and would welcome further industry engagement on doing so.
 - **Markets:** Lowering the current market participation thresholds and allowing for aggregation options are both positive and proactive steps and CanREA looks forward to further engagement on the proposed approach.
 - **Tariffs:**
 - Given the stakeholder consensus in the recent “Participant-Related Costs for DFOs (Substation Fraction) and DFO Cost Flow-Through Technical Session(s)” on the guiding Principles for the engagement, we recommend that these principles be formally reflected in this document. For clarity, these are:
 - Principle 1: Parity between transmission interconnection costs calculation for transmission connected customers and distribution connected customers while enabling effective price signals to ensure the optimal use of existing distribution and transmission facilities
 - Principle 2: Market participants should be responsible for an appropriate share of the costs of transmission facilities that are required to provide them with access to the transmission system (may include paying a contribution towards facilities paid for by other customers and refund to the customer that paid)
 - Principle 3: DCG participants should have cost certainty when making their final investment decision
 - Principle 4: DFOs should be provided with reasonable certainty re: cost treatment/recovery
 - Principle 5: Ease of understanding and implementation

	<ul style="list-style-type: none"> ▪ Page 15 states: “It is the AESO’s view that tariff price signals should reflect both the cost of transmission and the value created by having a connection to the AIES across transmission and distribution systems.” While we agree with this statement, we also suggest that the value of DERs to the system needs to be further studied, understood and accounted for as well.
<p>Do you have suggested changes to the activity timing in the <i>DER Roadmap</i> Integrated Plan? If yes, please be specific to why you would like to see the timing changed and what the suggested timing should look like.</p>	<ul style="list-style-type: none"> • Proposed timeline seems very comprehensive. AESO may want to reconsider the feasibility if all stakeholder engagements continue to be conducted virtually. • Bulk & Regional Tariff Design work stream projected out to Q4 2021 is somewhat concerning – Earlier resolution may be preferable from an investor certainty standpoint. If there has been any change to this timeline since the publication of the Roadmap document it would be useful to know.
<p>Are you aware of any recent DER research/resources/information that would provide the AESO more insight on this topic? If yes, please provide details or explain.</p>	<p>For your reference, we enclose a whitepaper commissioned by CanSIA, <u><i>Non-Wires Alternatives (NWAs) - Energizing Distributed Energy Resources to Bring Value to Canadian Grids, Utilities and Ratepayers</i></u> (March 2020)</p>