

Stakeholder Comment Matrix – Sept. 24, 2020

Bulk and Regional Tariff Design Session 2



Period of Comment: Sept. 24, 2020 through Oct. 8, 2020 Comments From: EDF Renewables Date: 2020-10-08	Contact: David Thornton Phone: 416-557-9155 Email: David.Thornton@edf-re.com
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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. **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?	
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.	
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.	<p>EDF supports a tariff design that reflects long-run marginal costs associated with investment decisions. If the 12-CP design does not properly reflect the benefit of reducing consumption or adding onsite generation, a change is reasonable.</p> <p>However, EDF does not support an option that does not reflect any value for onsite generation or storage that reduces transmission investment requirements in either the short-term or long-term.</p>

	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>	
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. Do you have additional clarifying questions that need to be answered to support your understanding?</p>	<p>Energy storage must be considered as a unique asset class. It is dispatchable, facilitates the efficient operation of the market and can be located to reduce transmission needs. It is not an end consumer of electricity, and options such as a non-firm tariff are reasonable to the extent storage is charged only for the truly variable costs it imposes on the system.</p> <p>A storage tariff should not influence real-time decision making, since the primary benefit of storage is allowing arbitrage and improving market efficiency. Tariff treatment should not create an incentive or disincentive for one type of market participation versus another, which is at risk with some of the AESO proposals.</p> <p>A storage tariff should incent, or at a minimum, not disincen, locational decisions that reduce the need for future transmission investment. The AESO's opportunity service option appears to incent poor locations because it would only be available where the storage asset contributed to a problem. This is not an efficient design choice.</p>
6.	<p>Additional comments</p>	<p>EDF believes a separate consultation should be undertaken for the storage tariff. This is a complex issue and very different from the issues associated with the bulk and regional redesign.</p>

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