Stakeholder Comment Matrix - Sept. 14, 2020

Request for Feedback on 2020-2021 Plan for ISO Tariff-Related Activities



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Contact:

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Period of Comment: Sept. 14, 2020 through Oct. 6, 2020

Comments From: Heartland Generation Ltd. (HGL)

Date: [2020/10/06] Email: Kurtis.Glasier@heartlandgeneration.com

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 matrix per organization.

4. Email your completed comment matrix to tariffdesign@aeso.ca by Oct. 6, 2020.

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

	Questions	Stakeholder Comments
1.	Is the publication of the 2020-2021 Plan for ISO Tariff-Related Activities ("2020-2021 Plan") useful to you? Would any additional information be helpful? Please be specific.	Yes, the publication of the 2020-2021 Plan is very useful and should become standard practice leading up to future Tariff filings. The proposed "phased" approach to tariff filing is also a major improvement that will streamline the consultation process and reduce regulatory burden. Many stakeholders are only interested in certain aspects of the Tariff, and any approach that allows stakeholders to save resources and participate more effectively is commendable.
2.	Are there any additional tariff-related activities that in your view require the AESO's and stakeholders' attention in 2021 that are not listed in the 2020-2021 Plan?	There does not appear to be any missing activities on the 2020-2021 Plan.
3.	Do you have suggested changes to the timing of activities in the 2020-2021 Plan schedule? If yes, please be specific to why you would like to see the timing changed and what the suggested timing should look like.	No, HGL does not have any suggested changes to the timing of activities in the 2020-2021 Plan schedule.



Do you have any other suggestions or comments you would like to share with the AESO related to the 2020-2021 Plan?

HGL is concerned with how the AESO has characterized the "Bulk and Regional Rate Redesign (with Energy Storage)" activity: "Evaluate the bulk and regional rate design, with a focus on addressing issues caused by 12-CP." This description seems prejudicial and presumptuous since the 12-CP methodology has been deemed to be "just and reasonable" by the Alberta Utilities Commission for years and formal evidence to the contrary has not yet been presented. For these reasons, HGL suggests the AESO adopt a more neutral characterization of the current approved rate design to prevent biasing the ongoing stakeholder consultations and subsequent proceeding.

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