

**Stakeholder Comment Matrix –
2019**

Request for feedback on 2020 plan for market-related initiatives



Period of Comment: Dec. 19, 2019 through Jan. 17, 2020 Comments From: Heartland Generation Ltd. Date: [2020/01/17]	Contact: [REDACTED] Phone: [REDACTED] Email: [REDACTED]
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The AESO is seeking comments from stakeholders on its 2020 Plan for Market-Related Initiatives.

	Questions	Stakeholder Comments
1.	<p>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>	<p>Heartland Generation Ltd. (HGL) commends the AESO on publishing the <i>2020 Plan for Market-Related Initiatives</i> and hopes that similar information is published for future years. This report is a useful high-level tool that allows stakeholders to plan for the year ahead. HGL believes that with further refinements this report will be an important aspect of stakeholder engagement.</p> <p>HGL believes that the <i>2020 Plan for Market-Related Initiatives</i> could be improved by providing more clarity around timelines (i.e. timing of activities involved), and a similar publication should be made available for other AESO departments that engage stakeholders.</p> <p>HGL recommends that the AESO provide more clarity on the activities being taken for each initiative in each market design process phase over the planning year. While HGL understands that the AESO may not have a perfect understanding of what the “Analysis” phase will involve, it would be helpful to stakeholders to understand the depth of analysis the AESO will conduct prior to the “Conception” stage. At a minimum, the AESO should indicate if it intends to hire an external expert for each specific initiative.</p> <p><i>The 2020 Plan for Market-Related Initiatives</i> stated the Short-term Storage and Long-term Storage activities would “be aligned with the Energy Storage Roadmap.” In August 2019, the AESO indicated in the <i>Energy Storage Roadmap</i> that activities would begin mid-2019; stakeholders would benefit from additional clarity if the <i>2020 Plan for Market-Related Initiatives</i> includes those same activities identified in the Roadmap and follows the same timelines.</p> <p>Further to HGL’s comments in the AESO’s BRP, HGL continues to advocate for the</p>

		<p>formation of a stakeholder committee to aid the AESO in developing its market initiatives. This stakeholder committee would balance the AESO's market priorities with those of industry and provide the AESO with indispensable input regarding the timing of market-related initiatives. Further, a market participant committee is consistent with the AESO's 2019 stakeholder engagement framework.</p>
2.	<p>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>?</p>	<p>Yes, HGL suggests that the review of the Mothball Outage Rule should be expanded to examine all generator outage ISO Rules and retirement obligations. It is important for any review to focus on how these rules work together. The requirements and process for taking units out of the market should be consistent and provide clarity to market participants. HGL also believes that the status of transmission access (i.e. parties' STS agreements with the AESO) should be included in this analysis. HGL also requests that the Market Surveillance Administrator (MSA) be asked to file its comments in advance given the MSA's role in these matters. This will foster agency alignment and allow stakeholders to comment on proposals from both market agencies simultaneously.</p>
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>HGL wants to promote efficiency through a reduction of regulatory burden on market participants and lessening the costs associated with Alberta's agencies, including the AESO. As such, the AESO should consider delaying the consultation, development, and implementation of certain initiatives in order to reduce the regulatory burden and the associated cost, which will also promote investor confidence in the market design. For clarity, where an initiative is discretionary, HGL believes that the AESO should carefully weigh its consultation and implementation costs with the estimated benefit. As stated above, HGL believes that an advisory stakeholder committee would be the ideal forum to have such discussions so that the energy-only market moves forward while ensuring agency costs are prudent, the regulatory burden on stakeholders is appropriate, and that the market design is stable to maintain investor confidence.</p> <p>HGL recommends that the "Dispatch Tolerance" and "Ramp Table Submissions" initiatives should be delayed, and not included in the plan for 2020. The current characteristics of the electricity market do not warrant further analysis into this initiative as there is no indication that a problem with dispatch variance exists to explore. HGL is concerned that this initiative is a solution in search of a problem, and that inclusion in the <i>2020 Plan for Market-Related Initiatives</i> is not prudent.</p>

4.	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?	HGL believes that the <i>2020 Plan for Market-Related Initiatives</i> is a good example of information and expectation sharing between the AESO and stakeholders. While there are improvements to be made (see above comments), the publication already provides valuable information to help stakeholders plan for the upcoming year. HGL recommends that other key AESO departments publicly publish similar plans for their initiatives and activities on an annual basis.
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Thank you for your input. Please email your comments to: stakeholder.relations@aeso.ca.