

Stakeholder Comment Matrix – June 25, 2020

Participant-Related Costs for DFOs (Substation Fraction) and DFO Cost Flow-Through
Technical Session 3



Period of Comment: June 25, 2020 through July 17, 2020	Contact: [REDACTED]
Comments From: Industrial Power Consumers Association of Alberta (IPCAA)	Phone: [REDACTED]
Date: 2020/07/17	Email: [REDACTED]

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 **July 17, 2020**.

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

	Questions	Stakeholder Comments
1.	<p>Please comment on Technical Session 3 hosted on June 25, 2020. Was the session valuable? Was there something the AESO could have done to make the session more helpful?</p>	<p>It would likely been much more useful to have provided the AESO proposal ahead of time so that all Alberta stakeholders could have a chance to digest the changes and implications to their business and, if required, participate in the meeting.</p>
2.	<p>Please comment on your level of support for the AESO's revised proposal and the level to which AESO's revised proposal supports the principles (as developed through this stakeholder engagement). Please be as specific as possible.</p>	<p>IPCAA is concerned that the AESO proposal is simply “kicking the can” down the road. DCG is an important sector of the Alberta market. Full and complete decisions need to be made on DCG so that investors can have financial certainty on the benefits of investing. This AESO direction simply adds to that investment uncertainty when combined with AESO statements in its Distributed Energy Resources Roadmap on the DCG credit.</p>
3.	<p>Please comment on any outstanding risks or issues you see with the AESO's revised proposal. Please be as specific as possible.</p>	<p>As the AESO proposal stands, a DCG:</p> <ol style="list-style-type: none"> 1. Has no cost to connect to a sub-station other than its own connection and pays no portion of the original transmission facilities investment cost paid by load; and 2. Will no longer will have an unhedged risk on future transmission costs. <p>However, this may change with an AUC review of distribution tariffs. IPCAA assumes the AESO is recommending a change in the sub-station fraction via the distribution tariffs for parity with transmission-connected generators. It would be helpful if the AESO could confirm this.</p>

4.	Please provide any further comments you may have on next steps regarding regulatory process and implementation. Please be as specific as possible.	Since the AESO is moving away from this issue and leaving it in the hands of the AUC and a potential change in distribution tariffs, this should happen as quickly as possible. Dealing with the DCG issues should be an immediate priority and the AESO should emphasize this to the AUC. DCG investors need financial certainty and consumers want this issue, and the DCG credit issue resolved promptly.
5.	Additional comments	

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