Stakeholder Comment Matrix - Sept. 14, 2020

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



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

Comments From: Suncor Energy Inc.

Date: 2020/10/06 Email: hklinkenborg@suncor.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.	The publication of tariff-related activities, just like the publication of the market-related initiatives, is useful to Suncor. The development of a combined publication would be further beneficial. Market rules and tariff elements need to work hand in hand and historically this has not always been achieved. It would be useful to get away from a split view to a holistic view and a combined list of activities would be a first step in this direction. Hyperlinks for all initiatives would be a useful quality of life feature.
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?	With the <i>Transmission Regulation</i> set to expire by the end of 2021, towards Q4 of 2021 it would be useful to start analysis and discussion of implications of upcoming changes. A work stream looking at wires utilization, and whether additional rate classes, particularly opportunity service classes, could improve utilization, would be useful. A work stream looking at the interplay between AESO rules and rates, for example Rider J, should also be considered.
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.	Suncor believes that the schedule for Tariff Modernization-> Bulk and Regional Rate Redesign (with Energy Storage) (Phase 1) is inappropriate. The process is clearly still in the Conception (C) phase since options are still being developed. Given that October 22 nd will be the first time for stakeholders to present alternatives, at least November should still be part of the Conception phase in order to allow stakeholders and the AESO to discuss and analyze alternatives. This would adjust the remaining schedule accordingly.
4.	Do you have any other suggestions or comments you would like to share with the AESO related to the 2020-2021 Plan?	Suncor notes a general lack of Analysis (A) in the plan. Suncor objects to the "focus on addressing issues caused by 12-CP" language. Suncor is not aware of any analysis that supports the assertion that 12-CP causes issues. Language in the activities matrix should be neutral.

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