

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: Turning Point Generation Date: Oct 8, 2020	Contact: Kipp Horton Phone: 403 233-2259 Email: Kipp.horton@windriver.ca
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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?	Yes, the session was valuable although TPG suggests that the rate design consultations regarding Energy Storage, being a unique asset unlike pure load or pure generators, are more appropriate in a distinct and separate process outside of the broader Bulk and Regional Tariff Design process.
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.	No, TPG is not supportive of the proposed approach. Energy Storage is a unique asset, unlike pure load or pure generators, and therefore should have a distinct and separate rate design process outside of the broader Bulk and Regional Tariff Design process.
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.	No, TPG does not support the AESO's perspective that 12-CP (status quo) is not a reasonable continued outcome of the Bulk and Regional Tariff Design. TPG requests that the AESO provide analysis so that stakeholders can understand the rationale driving the need to move away from the 12-CP methodology.

	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>	<p>No, the AESO's bookends A and B are not reasonable starting points since AESO has not provided the analysis to support the rationale driving the need to move away from the 12-CP methodology. 12-CP methodology should remain as a viable outcome unless demonstrated otherwise.</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.</p> <p>Do you have additional clarifying questions that need to be answered to support your understanding?</p>	<p>Yes. This is the first time that stakeholders in Alberta are tasked with contemplating Energy Storage assets within a tariff design process. As such, TPG suggests that a distinct and standalone process is required since energy storage assets are unique. For example, the AESO has recently initiated the Energy Storage Industry Learning Forum (ESILF), of which TPG is a member of, in order "to gather energy storage industry leaders together to discuss key learnings from energy storage integration in other jurisdictions as well as to share their perspectives on energy storage topics to assist the AESO in facilitating the integration of energy storage in Alberta." The ESILF has only just begun and learnings are underway. TPG suggests that a greater level of integration is required between the ESILF and a standalone energy storage tariff treatment consultation.</p>
6.	<p>Additional comments</p>	<p>None. TPG appreciates the opportunity to express its views. Thank you.</p>

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