

Stakeholder Comment Matrix

Designing Alberta's Capacity Market stakeholder sessions held January 12 and 16, 2017



Date of Request for Comment: <u>February 10, 2017</u>	Contact: <u>Jesse Row</u>
Period of Comment: <u>January 17, 2017</u> through <u>February 10, 2017</u>	Phone: <u>403-483-4810</u>
Comments From: <u>Alberta Energy Efficiency Alliance</u>	Email: <u>jesse.row@aeea.ca</u>
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To initiate stakeholder consultation on the capacity market design, the AESO hosted kick-off stakeholder sessions in Calgary and Edmonton on January 12 and 16, 2017. At these sessions the AESO presented a brief description about capacity markets, described our vision of the desired end state, proposed an approach to undertaking the design and a potential roadmap for completing the work. In addition, the AESO presented an approach to consultation, as well as a set of proposed criteria and assumptions to be used as tools to guide the capacity market design.

The presentation can be [found here](#).

We request your feedback about these topics as well as any others that you believe are appropriate for the AESO to consider. We expect a great deal of feedback based on the level of interest demonstrated by stakeholders at the sessions, and request you use this structured template to provide your comments. This will allow the AESO to quickly synthesize and publish the feedback from a broad range of interested parties.

All stakeholder comments received will be reviewed by the AESO and posted on the AESO website.

Capacity Market Design Approach

Please indicate in your response whether you support the planned design approach, or if not, why?

Section	Approach	Stakeholder Response
Proposed desired end state of capacity market development <i>Slide 7</i>	<p>Do you support the following statement regarding the desired end state for the capacity market? Do you disagree with the statement or have alternative wording? Please provide reasons for your response.</p> <p><i>“The desired end state is to develop a capacity market that utilizes competitive market forces, ensures continued supply adequacy and reliability at a reasonable cost and is flexible to reflect the unique aspects of Alberta’s electricity industry.”</i></p>	<p>Supportive</p>
Key design questions for capacity market development <i>Slides 8 – 11</i>	<p>Is the preliminary list of key design questions an inclusive list? Is it clear what area of capacity market development each question is intending to address? What clarification is required on any of these items? What additional questions or areas, if any, do you think should be added to the list to ensure a comprehensive capacity market design? Please provide as much detail as possible.</p> <ul style="list-style-type: none"> – <i>How much capacity needs to be procured? (Resource adequacy requirement)</i> – <i>Who will buy the capacity? (Obligation to procure)</i> – <i>When and how often will capacity be purchased? (Procurement timing and frequency)</i> – <i>How long will the capacity delivery period be? (Term)</i> – <i>Who can provide capacity? How much can they provide? (Eligibility)</i> 	<p>An important question to be added:</p> <p>- How will the costs of the capacity market be passed on to end consumers?</p> <p>While this isn’t so important to the players around the table currently, it will be a very important question that will come up for the public. How the costs will be passed on should be considered and discussed so that the approach to doing this can be communicated to the public when details about the capacity market are communicated. For example, an analysis on how it will impact average bills for residential and non-residential customers will be important. It will also be important to look into whether these costs should be passed on as a fixed charge to residential consumers or if there should be some variable component to it. This is currently very important as there is a growing sensitivity to the amount of fixed charges on electricity bills.</p>

Section	Approach	Stakeholder Response
	<ul style="list-style-type: none"> – <i>How do we know that capacity has been provided? (Performance assessments)</i> – <i>How will the capacity market work? (Market mechanics)</i> – <i>How will capacity providers be paid? How will capacity costs be allocated? (Capacity market settlement)</i> – <i>How will the capacity market impact the energy and ancillary services markets? (Inter-operability implications)</i> 	
Design dependencies and sequencing <i>Slide 12</i>	What additional information do you require regarding sequencing? Do you agree with dependencies between design elements and the proposed sequencing of the design? Is there an alternative sequencing that should be followed? Is there a different approach entirely that should be considered? Please provide reasons for your response.	The sequencing makes sense.
Capacity market development roadmap <i>Slide 13</i>	What additional questions or clarification do you have regarding the roadmap? Do you have any issues or concerns with the proposed roadmap for designing and implementing the capacity market? Are there items or considerations missing from the roadmap?	The potential and timing for both primary and secondary auctions should be added to the roadmap / timeline as this process moves forward.
AESO Consultation Principles <i>Slide 15</i>	Do you have any questions regarding the AESO's consultation principles as they pertain to development of the capacity market? Are there additional concepts or principles which should be considered? Please provide reasons for your response.	The principles as presented are good. I would suggest some additional consideration for parties that have not regularly participated in AESO consultations so that they can be fully engaged in the process and not be disadvantaged compared with traditional stakeholders. A good example of this would be some additional communication to remind stakeholders of opportunities and deadlines for input.

Section	Approach	Stakeholder Response
Proposed approach to answering key design questions <i>Slides 16 – 17</i>	<p>What clarification or additional information do you require regarding the proposed approach?</p> <p>Do you support the two-stage iterative process proposed for the capacity market design?</p> <p>Do you agree this process will deliver an inclusive, timely, efficient, cohesive and comprehensive design?</p> <p>Do you think that the process will result in the expected benefits listed?</p> <p>Are there modifications to this approach that would improve its effectiveness?</p> <p>Is there an alternative consultation approach you would like us to consider and why? Please describe the alternative in as much detail as possible.</p>	<p>Additional information required: How to get involved.</p> <p>The process as a whole looks good.</p>
Design Alternatives Sheets <i>Slide 18</i>	<p>Do you have any comments regarding the proposed purpose, structure or content for of the proposed design documentation?</p>	<p>It is currently unclear as to how stakeholders get involved in providing their perspectives on the Design Alternatives Sheets.</p>
Term Sheets <i>Slide 19</i>	<p>Do you have any comments regarding the proposed purpose, structure or content for of the proposed design documentation?</p>	
Design development steps <i>Slide 20</i>	<p>Do you have any questions regarding the proposed steps?</p> <p>Do you support the proposed design development process?</p> <p>What should be considered before a design component moves to the stage of being drafted into legal language?</p>	<p>What stage(s) does the government get involved at?</p>

Capacity Market Criteria

Please indicate in your response whether you support the following market criteria and provide reasons for your position.

Section	Subject	Stakeholder Response
Potential criteria for supply adequacy and reliability <i>Slide 22</i>	Do you support the following criteria regarding the supply adequacy and reliability category? Please explain. <i>The capacity market should achieve desired reliability objectives by creating a real and measurable supply adequacy product.</i>	Suggest instead of calling it a 'supply adequacy product' that it be called a 'capacity product'. They could essentially be the same thing, but it is important to be clear that demand side products can also help achieve supply adequacy so our language should be inclusive of that.
Potential criteria for supply adequacy and reliability <i>Slide 22</i>	Do you support the following criteria regarding the supply adequacy and reliability category? Please explain. <i>The capacity market should contribute to the reliable operation of the electricity grid and implementation should be consistent with, and complementary to, other measures aimed at ensuring reliability.</i>	Agreed.
Potential criteria for supply adequacy and reliability <i>Slide 22</i>	Are there additional criteria which should be included in this category?	
Potential criteria for the capacity market <i>Slide 23</i>	Do you support the following criteria regarding the market category? Please explain. <i>The capacity market should be fair, efficient, and openly competitive.</i>	Yes. Competition should include the opportunity to bid in demand side products as well as supply side products.
Potential criteria for the capacity	Do you support the following criteria regarding the market category? Please explain.	Yes.

Section	Subject	Stakeholder Response
market <i>Slide 23</i>	<i>The procurement of capacity should employ market-based mechanisms and a competitive market for capacity should be developed.</i>	
Potential criteria for the capacity market <i>Slide 23</i>	Do you support the following criteria regarding the market category? Please explain. <i>A wide variety of technologies should be able to compete to provide capacity.</i>	Yes, as already stated, the market should be open to a wide variety of technologies including both demand side and supply side capacity products.
Potential criteria for the capacity market <i>Slide 23</i>	Do you support the following criteria regarding the market category? Please explain. <i>Capacity market mechanisms, outcomes and relevant data should be transparent.</i>	
Potential criteria for the capacity market <i>Slide 23</i>	Do you support the following criteria regarding the market category? Please explain. <i>There should be a well-defined product and an effective and efficient capacity price signal.</i>	Agree there should be an effective capacity price signal but some may use this to suggest a preference towards supply side capacity products. I don't think this is necessary to achieve an effective price signal but that's something that can be discussed further along the design process.
Potential criteria for the capacity market <i>Slide 23</i>	Are there additional criteria which should be included in this category?	
Potential criteria for costs and risk <i>Slide 24</i>	Do you support the following criteria regarding the costs and risks category? Please explain. <i>Long-term investment risks should continue to be largely borne by investors rather than consumers.</i>	The philosophy behind this makes sense but the application of it needs to be done carefully as it could result in higher overall costs for consumers.

Section	Subject	Stakeholder Response
Potential criteria for costs and risk <i>Slide 24</i>	Do you support the following criteria regarding the costs and risks category? Please explain. <i>The capacity market should instil investor confidence and should result in private investment.</i>	Agreed.
Potential criteria for costs and risk <i>Slide 24</i>	Do you support the following criteria regarding the costs and risks category? Please explain. <i>There should be an effective balance between capacity cost and supply adequacy.</i>	Agreed.
Potential criteria for costs and risk <i>Slide 25</i>	Do you support the following criteria regarding the costs and risks category? Please explain. <i>The term of the capacity obligation should be as short as possible while ensuring supply adequacy objectives are achieved.</i>	I don't agree with this one. While I like the idea of risk being borne as much as possible by the proponent, there are more important criteria like ensuring an adequate capacity price signal and managing overall costs. At times, a longer obligation term may help with these more important objectives so I would suggest this criteria be characterized as a balance between the obligation term, supply adequacy and cost – perhaps by combining with the criteria above it.
Potential criteria for costs and risk <i>Slide 25</i>	Do you support the following criteria regarding the costs and risks category? Please explain. <i>Reasonable capacity costs for consumers should be achieved through effective competition and administratively determined prices should be avoided.</i>	Yes.

Section	Subject	Stakeholder Response
Potential criteria for costs and risk <i>Slide 24</i>	Do you support the following criteria regarding the costs and risks category? Please explain. <i>The design should provide mechanisms for consumers to hedge the cost of capacity if and where appropriate.</i>	Yes.
Potential criteria for costs and risk <i>Slides 24 – 25</i>	Are there additional criteria which should be included in this category?	
Potential criteria for flexibility <i>Slide 26</i>	Do you support the following criteria regarding the category of flexibility? Please explain. <i>Unique aspects of Alberta's electricity system should be considered in the design of the capacity market (e.g. nature of load/generation, levels of cogeneration, limited interties, large geographic area, etc.).</i>	Always need to consider local conditions, but need to be open to the way others do things as well.
Potential criteria for flexibility <i>Slide 26</i>	Do you support the following criteria regarding the category of flexibility? Please explain. <i>The capacity market should be compatible with other components of the electricity framework, and should be robust and adaptable to different government policy initiatives related to the electricity sector.</i>	Suggest adding a note about maintaining investor confidence as adaptations to the system are made.
Potential criteria for flexibility <i>Slide 26</i>	Are there additional criteria which should be included in this category?	May want to note that adaptation is likely to occur as market conditions change (and Alberta gets experience with its own capacity market) as we've seen in other jurisdictions. (or perhaps this is obvious)
Potential criteria	Do you support the following criteria regarding the timely	Yes. Timely launch is very important.

Section	Subject	Stakeholder Response
for timely development <i>Slide 27</i>	development category? Please explain. <i>Market should be targeted to open in 2019 for start of first capacity procurement.</i>	
Potential criteria for timely development <i>Slide 27</i>	Do you support the following criteria regarding the timely development category? Please explain. <i>The initial degree of change to the current energy and ancillary service market should be minimized.</i>	Yes.
Potential criteria for timely development <i>Slide 27</i>	Do you support the following criteria regarding the timely development category? Please explain. <i>Simple and straightforward implementation should be a priority.</i>	Yes.
Potential criteria for timely development <i>Slide 28</i>	Do you support the following criteria regarding the timely development category? Please explain. <i>To the extent a staged implementation is pursued, the expected timing and nature of future changes should be provided.</i>	Yes.
Potential criteria for timely development <i>Slide 28</i>	Do you support the following criteria regarding the timely development category? Please explain. <i>The risks of regulatory delay and need for re-design should be minimized.</i>	Yes.
Potential criteria for timely development	Do you support the following criteria regarding the timely development category? Please explain. <i>Best practices and lessons learned from other capacity market</i>	Yes. There are a lot of similarities among some markets. It makes sense to start with something similar.

Section	Subject	Stakeholder Response
Slide 28	<i>implementations should be leveraged as much as possible.</i>	
Potential criteria for timely development Slides 27 - 28	Are there additional criteria which should be included in this category? 	
General feedback regarding criteria Slides 21 – 28	Are there additional categories of criteria which should be considered? Do you require additional explanation or have questions regarding any of the categories or criteria? Do you think all criteria are equally important or should some take precedence over others?	Adequate reliability at a reasonable cost for Albertans are the most important criteria here. An open market, managing risks and timely development contribute to these while flexibility is just a reality that needs to be dealt with.

Capacity Market Assumptions

Please indicate in your response whether you support adopting the following starting assumptions and provide reasons for your position.

Item	Assumption	Stakeholder Response
1 Slide 30	Do you support adopting the following assumption? Please explain. <i>A capacity obligation is a forward physical obligation on capacity suppliers that requires the capacity sold in the capacity market to be available to provide energy when needed. This obligation is created when the supplier's offer is cleared in the capacity market.</i>	The phrase needs to be adapted to be inclusive of demand side capacity. I.e. providing energy isn't the only way to meet a capacity obligation.
2 Slide 30	Do you support adopting the following assumption? Please explain. <i>All existing capacity "must offer" their eligible capacity to the capacity market. Planned capacity must offer for the delivery year they are connected.</i>	Yes.
3 Slide 30	Do you support adopting the following assumption? Please explain. <i>The capacity market will be designed as a single zone with the capability of adding zones should it be required due to a change in transmission policy or other factors.</i>	Fine starting point but suggest AESO seriously look at the potential costs and benefits to consumers of a different approach to dealing with geographical considerations in the province.
4 Slide 31	Do you support adopting the following assumption? Please explain. <i>The resource adequacy requirement for Alberta will be centrally determined.</i>	Yes. Similar to other capacity markets.
5 Slide 31	Do you support adopting the following assumption? Please explain. <i>The capacity market is intended to ensure supply adequacy. Other attributes such as carbon output, total capacity factor, ramp flexibility, energy production costs, etc., are not considered within the capacity market.</i>	Appropriate as long as other mechanisms are used to address other attributes that are important to Albertans.

Item	Assumption	Stakeholder Response
6 Slide 31	Do you support adopting the following assumption? Please explain. <i>Capacity and energy/ancillary services are separate products, and are procured independently.</i>	Yes.
7 Slide 32	Do you support adopting the following assumption? Please explain. <i>Participants do not need to be successful in the capacity market to participate in the energy and ancillary service markets.</i>	Yes.
8 Slide 32	Do you support adopting the following assumption? Please explain. <i>While receiving support payments, Renewable Electricity Program (REP) round 1 winners are not eligible to sell REP capacity in the capacity market owing to the Indexed REC payment mechanism chosen.</i>	I'm not up to speed enough on this one to comment at this time.
9 Slide 32	Do you support adopting the following assumption? Please explain. <i>Capacity market mechanics/behaviour will have regulatory oversight. Market outcomes will be the result of market clearing, unless otherwise demonstrated.</i>	Yes.
General feedback regarding assumptions	Are there additional assumptions which should be considered? Do you require additional explanation or have questions regarding any of the assumptions?	

General Feedback

Please provide as much detail as possible in your responses below.

Section	Subject	Stakeholder Response
Next Steps <i>Slides 33 – 34</i>	<p>Please provide any general feedback you have regarding the January 12/16 AESO presentation content or format.</p> <p>Please provide any general feedback you have regarding formats for future materials or stakeholder sessions.</p>	<p>Already completed as part of the session survey.</p>
Next Steps <i>Slides 33 – 34</i>	<p>Please provide any feedback you have regarding next steps in the capacity market development process.</p>	<p>It would be good to know future engagement points, but I'm assuming these are coming.</p>
Next Steps <i>Slides 33 – 34</i>	<p>Assuming criteria, assumptions, key questions, sequencing and stakeholder approach are finalized, do you agree that next steps are to begin consultation on the first detailed design components? Do you agree that these items need to be resolved before detailed design components begin to be addressed?</p> <p>Other than the items listed above, do other topics need to be discussed or addressed, or other information provided, before detailed design discussions begin?</p>	<p>Consultation on the first detailed design components makes sense once some adjustments to the criteria, assumptions, etc. have been made based on the feedback you've received. I don't recall reviewing a list of these first detailed design components to be worked on, but please let me know if I've missed them.</p>
General Information	<p>Please provide any additional comments or information regarding topics which you think are relevant but have not been specifically addressed above.</p>	<p>Thank you for the opportunity to provide this level of feedback at this time. The process that you're undertaking has been quite good to date and I look forward to seeing how input is incorporated into the work as things move forward.</p>