

## Rate Sheets Consultation – September 7, 2021 Comments

### Stakeholder comments on Rate Sheets [Posted September 22, 2021]

1. Alberta Direct Consumers Association (ADC)
2. Canadian Renewable Energy Association (CanREA)
3. Capital Power Corporation
4. Energy Storage Canada (ESC)
5. ENMAX Corporation
6. Greengate Power Corporation
7. Industrial Power Consumers Association of Alberta (IPCAA)
8. TransAlta Corporation (TAC)

# Stakeholder Comment Matrix – Sept. 7, 2021

Bulk and Regional Tariff Design – Tariff and DOS Rate Sheets, Tariff Terms & Conditions, and DOS Appendix A



Comment period:	<b>Sept. 7, 2021 to Sept. 21, 2021</b>	Contact:	Colette Chekerda
Comments from:	Alberta Direct Connect Consumer Association “ADC”	Phone:	780-920-9399
Date:	2021/09/21	Email:	colette@carmal.ca

## 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 comment matrix per organization.**
4. Email your completed comment matrix to [tariffdesign@aeso.ca](mailto:tariffdesign@aeso.ca) by **Sept. 21, 2021**.

The AESO values stakeholder feedback and invites all interested stakeholders to provide their comments on the proposed drafts of the Bulk and Regional Preferred Rate Design and Modernized Demand Opportunity Service (DOS) design: Tariff Rate Sheets, Tariff Terms & Conditions, DOS Rate Sheet, and DOS Proforma Agreement. Please be as specific as possible with your responses. Thank you.

Note that the AESO is seeking feedback as to whether the rate sheets and other revisions to the ISO tariff are clear and effectively reflect the AESO's Preferred Rate Design and the Modernized DOS design as presented during Stakeholder Sessions 5, 5B (DOS), 6A and 6B. The AESO appreciates all of the feedback it has previously received regarding the Preferred Rate Design and Modernized DOS and will not be considering additional comments on the rate design at this time.

Questions		Stakeholder Comments
1.	<p><b>Tariff Rate Sheets</b></p> <p>(i) Do you believe the AESO's revisions in the proposed draft provide clarity and are effective as written? Why or why not.</p> <p>(ii) Are there additional details that need to be included? If yes, please be specific.</p> <p>(iii) Is anything missing? If yes, please be specific.</p>	ADC has no comments on the tariff sheets until the AUC issues a decision on the tariff design.
2.	<p><b>Tariff Terms &amp; Conditions</b></p>	

Questions	Stakeholder Comments
<ul style="list-style-type: none"> <li>(i) Do you believe the AESO's revisions in the proposed draft provide clarity and are effective as written? Why or why not.</li> <li>(ii) Are there additional details that need to be included in this authoritative document? If yes, please be specific.</li> <li>(iii) Is anything missing? If yes, please be specific.</li> </ul>	<p>Question (i): For the most part, the AESO's revisions provide clarity; however, we offer the following comments:</p> <ul style="list-style-type: none"> <li>• In ISO Tariff – Section 5, paragraph 5.3(6c): Is the AESO suggesting that if there have been no changes to the DTS contract capacity in the prior 5 years that the AESO will waive the notice period and the PILON? If yes, this is a welcome change. Are there conditions where the AESO would not waive the notice period or PILON if the site met this criteria?</li> <li>• In ISO Tariff – Section 5, paragraph 5.3.7: The ADC supports the opportunity for all DTS contract holders to right size their contract capacity without penalty. The ADC submits that not all loads (especially those direct connect loads receiving DTS service through a Distribution company flow through rate) may be aware of the DTS contract capacity at the POD. The AESO should compile a list of POD's that would benefit from a DTS contract capacity adjustment.</li> <li>• In ISO Tariff – Section 9, paragraph 9.3(4): ADC agrees with the expansion of rate DOS to specifically include unplanned and forced outages as a reason to utilize Rate DOS.</li> </ul>
<p>3. <b>DOS Rate Sheet</b></p> <ul style="list-style-type: none"> <li>(i) Do you believe the AESO's revisions in the proposed draft provide clarity and are effective as written? Why or why not.</li> <li>(ii) Are there additional details that need to be included in this authoritative document? If yes, please be specific.</li> <li>(iii) Is anything missing? If yes, please be specific.</li> </ul>	<ul style="list-style-type: none"> <li>• ADC remains concerned with the 20% annual load factor.</li> </ul>
<p>4. <b>DOS Proforma Agreement</b></p> <ul style="list-style-type: none"> <li>(i) Do you believe the AESO's revisions in the proposed draft provide clarity and are effective as written? Why or why not.</li> <li>(ii) Are there additional details that need to be included in this authoritative document? If yes, please be specific.</li> </ul>	<p>No comments at this time.</p>

Questions		Stakeholder Comments
	(iii) Is anything missing? If yes, please be specific.	
5.	Would it be helpful for the AESO to develop additional guidance information, potentially in the form of an information document, once the Alberta Utilities Commission makes its decision on the Bulk and Regional Tariff Application? If yes, please specify what additional guidance would be helpful.	No comments at this time.
6.	Additional comments	None at this time

Thank you for your input. Please email your completed matrix to: [tariffdesign@aeso.ca](mailto:tariffdesign@aeso.ca)

# Stakeholder Comment Matrix – Sept. 7, 2021

Bulk and Regional Tariff Design – Tariff and DOS Rate Sheets, Tariff Terms & Conditions, and DOS Appendix A



Comment period:	<b>Sept. 7, 2021 to Sept. 21, 2021</b>	Contact:	Leonard Olien
Comments from:	Canadian Renewable Energy Association	Phone:	587-971-0049
Date:	2021/09/21	Email:	lolien@renewablesassociation.ca

## Instructions:

1. Please fill out the section above as indicated.
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The AESO values stakeholder feedback and invites all interested stakeholders to provide their comments on the proposed drafts of the Bulk and Regional Preferred Rate Design and Modernized Demand Opportunity Service (DOS) design: Tariff Rate Sheets, Tariff Terms & Conditions, DOS Rate Sheet, and DOS Proforma Agreement. Please be as specific as possible with your responses. Thank you.

Note that the AESO is seeking feedback as to whether the rate sheets and other revisions to the ISO tariff are clear and effectively reflect the AESO's Preferred Rate Design and the Modernized DOS design as presented during Stakeholder Sessions 5, 5B (DOS), 6A and 6B. The AESO appreciates all of the feedback it has previously received regarding the Preferred Rate Design and Modernized DOS and will not be considering additional comments on the rate design at this time.

	Questions	Stakeholder Comments
1.	<p><b>Tariff Rate Sheets</b></p> <p>(i) Do you believe the AESO's revisions in the proposed draft provide clarity and are effective as written? Why or why not.</p> <p>(ii) Are there additional details that need to be included? If yes, please be specific.</p> <p>(iii) Is anything missing? If yes, please be specific.</p>	
2.	<p><b>Tariff Terms &amp; Conditions</b></p>	<p>The consequences described in Section 9.6(4) seems to be harsher than as described in the AESO stakeholder sessions. In the stakeholder sessions, it was communicated that non-compliance with one of factor (a), (b) or (c), in section 9.6(1)</p>

Questions	Stakeholder Comments
<p>(i) Do you believe the AESO's revisions in the proposed draft provide clarity and are effective as written? Why or why not.</p> <p>(ii) Are there additional details that need to be included in this authoritative document? If yes, please be specific.</p> <p>(iii) Is anything missing? If yes, please be specific.</p>	<p>would lead to some part of the metered energy being charged at rate DTS and could lead to a change in the volume of the DOS and DTS contracts. The current wording indicates a market participant would lose access to DOS and all energy would be charged at DTS, which represents a significant increase in consequences.</p> <p>Further, Sections 9.6(1) – (3) indicate that the burden of proof lies with the market participant to demonstrate eligibility for DOS. CanREA believes that the burden of proof lies with the AESO to demonstrate a loss of eligibility. To that end, CanREA suggests the following wording for sections 9.6(1) – (3);</p> <p>9.6(1) If one or more of the following events has occurred:</p> <ul style="list-style-type: none"> <li>(a) the market participant fails to respond to a dispatch or directive from the ISO;</li> <li>(b) the market participant's use of the demand opportunity service exceeds the demand opportunity service contract capacity;</li> <li>(c) the market participant's use of the demand opportunity service exceeds the maximum annual load factor that the ISO determines in accordance with Rate DOS; or</li> <li>(d) The market participant no longer has a system access service agreement for Rate DTS,</li> </ul> <p>the ISO may investigate the market participant's reasons why the event in (i)-(iv) occurred.</p> <p>(2) The investigation in (1) shall include notice to the market participant and a reasonable opportunity for the market participant to explain the circumstances.</p> <p>(3) Following its investigation, the ISO may deem the market participant to have misrepresented its use of Rate DOS under the ISO tariff and the system access service agreement for Rate DOS if, following consideration of the market participant's reasons, the ISO</p>

	Questions	Stakeholder Comments
		<p>(a) confirms that one or more of the events in (1)(a)-(d) has occurred; and,</p> <p>(b) concludes that the market participant no longer meets the eligibility criteria in section 9.3.</p>
3.	<p><b>DOS Rate Sheet</b></p> <p>(i) Do you believe the AESO's revisions in the proposed draft provide clarity and are effective as written? Why or why not.</p> <p>(ii) Are there additional details that need to be included in this authoritative document? If yes, please be specific.</p> <p>(iii) Is anything missing? If yes, please be specific.</p>	<p>CanREA seeks clarity on the loss charge as indicated in section 3(2)(b). Does the does DOS facility received a credit for losses if located in areas where a generator would be charged for losses and vice versa? For example, for a storage facility at a location where the AESO determines the loss factor to be 5%, the facility would pay 5% on discharged energy (per STS), but would it the receive a 5% credit on charging energy?</p>
4.	<p><b>DOS Proforma Agreement</b></p> <p>(i) Do you believe the AESO's revisions in the proposed draft provide clarity and are effective as written? Why or why not.</p> <p>(ii) Are there additional details that need to be included in this authoritative document? If yes, please be specific.</p> <p>(iii) Is anything missing? If yes, please be specific.</p>	
5.	<p>Would it be helpful for the AESO to develop additional guidance information, potentially in the form of an information document, once the Alberta Utilities Commission makes it decision on the Bulk and Regional Tariff Application? If yes, please specify what additional guidance would be helpful.</p>	<p>It would be helpful for the AESO to include, in an information document, that energy storage resources will qualify for the DOS Dispatchable rate under sections 9.3(1), 9.3(2) and 9.3(3) because there are no reasonable market conditions under which an energy storage facility would participate in the market under DTS. Having the AESO recognize this fact will increase investor confidence in the ability of energy storage resources to participate in the Alberta electricity market.</p>

	Questions	Stakeholder Comments
6.	Additional comments	

Thank you for your input. Please email your completed matrix to: [tariffdesign@aeso.ca](mailto:tariffdesign@aeso.ca)



# Stakeholder Comment Matrix – Sept. 7, 2021

Bulk and Regional Tariff Design – Tariff and DOS Rate Sheets, Tariff Terms & Conditions, and DOS Appendix A



Comment period:	<b>Sept. 7, 2021 to Sept. 21, 2021</b>	Contact:	Megan Gill
Comments from:	Capital Power	Phone:	403.827.3566
Date:	2021/09/21	Email:	mgill@capitalpower.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 comment matrix per organization.**
4. Email your completed comment matrix to [tariffdesign@aeos.ca](mailto:tariffdesign@aeos.ca) by **Sept. 21, 2021**.

The AESO values stakeholder feedback and invites all interested stakeholders to provide their comments on the proposed drafts of the Bulk and Regional Preferred Rate Design and Modernized Demand Opportunity Service (DOS) design: Tariff Rate Sheets, Tariff Terms & Conditions, DOS Rate Sheet, and DOS Appendix A. Please be as specific as possible with your responses. Thank you.

Note that the AESO is seeking feedback as to whether the rate sheets and other revisions to the ISO Tariff are clear and effectively reflect the AESO's Preferred Rate Design and the Modernized DOS design as presented during Stakeholder Sessions 5, 5B (DOS), 6A and 6B. The AESO appreciates all of the feedback it has previously received regarding the Preferred Rate Design and Modernized DOS and will not be considering additional comments on the rate design at this time.

Questions		Stakeholder Comments
1.	<p><b>Tariff Rate Sheets</b></p> <p>(i) Do you believe the AESO's revisions in the proposed draft provide clarity and are effective as written? Why or why not.</p> <p>(ii) Are there additional details that need to be included? If yes, please be specific.</p> <p>(iii) Is anything missing? If yes, please be specific.</p>	Capital Power does not have any comments on the draft tariff rate sheets at this time.
2.	<p><b>Tariff Terms &amp; Conditions</b></p>	Capital Power does not have any comments on the draft changes to the tariff terms and conditions at this time.

Questions	Stakeholder Comments
(i) Do you believe the AESO's revisions in the proposed draft provide clarity and are effective as written? Why or why not. (ii) Are there additional details that need to be included in this authoritative document? If yes, please be specific. (iii) Is anything missing? If yes, please be specific.	
<b>3. DOS Rate Sheet</b> (i) Do you believe the AESO's revisions in the proposed draft provide clarity and are effective as written? Why or why not. (ii) Are there additional details that need to be included in this authoritative document? If yes, please be specific. (iii) Is anything missing? If yes, please be specific.	<p>Capital Power believes the following changes are required to the DOS Rate Sheet to provide more clarity.</p> <ul style="list-style-type: none"> <li>Section 1 – More details are needed to clarify when DOS is applied. For example, does a Market Participant have to be on rate DTS prior to DOS being applied? Or does a Market Participant apply for service under both DOS and DTS simultaneously?</li> <li>Section 2(1)(c) – The term “maximum annual load factor balance” should be defined.</li> <li>Section 2(2)(b) –The term “Rate DOS DTS surcharge rate” is a new term and should be defined (or this section should be reworded to provide clarity).</li> <li>Section 3 – The terms “DOS dispatchable”, “DOS term”, and “DTS surcharge rate” should be defined with a clear explanation for when each is applied. There should be more consistent use of this terminology throughout the DOS Rate Sheet.</li> </ul>
<b>4. DOS Appendix A</b> (i) Do you believe the AESO's revisions in the proposed draft provide clarity and are effective as written? Why or why not. (ii) Are there additional details that need to be included in this authoritative document? If yes, please be specific. (iii) Is anything missing? If yes, please be specific.	<p>Capital Power does not have any comments at this time.</p>

	Questions	Stakeholder Comments
5.	Would it be helpful for the AESO to develop additional guidance information, potentially in the form of an information document, once the Alberta Utilities Commission makes its decision on the Bulk and Regional Tariff Application? If yes, please specify what additional guidance would be helpful.	It would be helpful for the AESO to develop an information document on DOS participation and obligations in the market. This information document should confirm energy storage eligibility for DOS and provide exemptions for energy storage market participants to prove eligibility under Sections 9.3(1), 9.3(2), and 9.3(3) of the DOS Terms and Conditions. This would not adversely affect the intent of DOS as there are only limited conditions in which an energy storage facility would require DTS. Furthermore, this would increase investor confidence and reduce red tape for energy storage resources to participate in the Alberta electricity market.
6.	Additional comments	

Thank you for your input. Please email your completed matrix to: [tariffdesign@aeso.ca](mailto:tariffdesign@aeso.ca)

# Stakeholder Comment Matrix – Sept. 7, 2021

Bulk and Regional Tariff Design – Tariff and DOS Rate Sheets, Tariff Terms & Conditions, and DOS Appendix A



Comment period:	<b>Sept. 7, 2021, to Sept. 21, 2021</b>	Contact:	Justin Rangooni
Comments from:	Energy Storage Canada	Phone:	647.627.1815
Date:	2021-09-21	Email:	jrangooni@energystoragecanada.org

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Note that the AESO is seeking feedback as to whether the rate sheets and other revisions to the ISO tariff are clear and effectively reflect the AESO's Preferred Rate Design and the Modernized DOS design as presented during Stakeholder Sessions 5, 5B (DOS), 6A and 6B. The AESO appreciates all of the feedback it has previously received regarding the Preferred Rate Design and Modernized DOS and will not be considering additional comments on the rate design at this time.

Questions		Stakeholder Comments
1.	<p><b>Tariff Rate Sheets</b></p> <p>(i) Do you believe the AESO's revisions in the proposed draft provide clarity and are effective as written? Why or why not.</p> <p>(ii) Are there additional details that need to be included? If yes, please be specific.</p> <p>(iii) Is anything missing? If yes, please be specific.</p>	<p>The blackline amendments proposed by the AESO appears to align with the materials presented by the AESO through the Bulk &amp; Regional tariff stakeholder consultation.</p> <p>Additional details on the frequency that the AESO will re-assess the energy rate portion of cost allocation for the preferred rate design would be helpful (i.e., will the energy portion be calculated on an annual basis or fixed for a certain term?).</p>
2.	<p><b>Tariff Terms &amp; Conditions</b></p>	<p>The blackline amendments proposed by the AESO appears to align with the materials presented by the AESO through the Bulk &amp; Regional tariff stakeholder consultation.</p>

Questions	Stakeholder Comments
(i) Do you believe the AESO's revisions in the proposed draft provide clarity and are effective as written? Why or why not. (ii) Are there additional details that need to be included in this authoritative document? If yes, please be specific. (iii) Is anything missing? If yes, please be specific.	ESC has no further comments on the authoritative documents at this time.
<b>3. DOS Rate Sheet</b> (i) Do you believe the AESO's revisions in the proposed draft provide clarity and are effective as written? Why or why not. (ii) Are there additional details that need to be included in this authoritative document? If yes, please be specific. (iii) Is anything missing? If yes, please be specific.	ESC requests AESO to clarify if there is any Recall Priority difference between DOS Dispatchable and DOS Term.
<b>4. DOS Proforma Agreement</b> (i) Do you believe the AESO's revisions in the proposed draft provide clarity and are effective as written? Why or why not. (ii) Are there additional details that need to be included in this authoritative document? If yes, please be specific. (iii) Is anything missing? If yes, please be specific.	ESC has no comments on the DOS Proforma Agreement
<b>5.</b> Would it be helpful for the AESO to develop additional guidance information, potentially in the form of an information document once the Alberta Utilities Commission makes its decision on the Bulk and Regional Tariff Application? If yes, please specify what additional guidance would be helpful.	Yes, additional guidance information would be beneficial including <ul style="list-style-type: none"> <li>• Examples of real-time operation that lead to DOS dispatch instructions and what options proponents in responding/adjusting energy bids</li> <li>• Example calculations and explanation of settlement process on a monthly and annual basis</li> </ul>

	Questions	Stakeholder Comments
6.	Additional comments	

Thank you for your input. Please email your completed matrix to: [tariffdesign@aeso.ca](mailto:tariffdesign@aeso.ca)

# Stakeholder Comment Matrix – Sept. 7, 2021

Bulk and Regional Tariff Design – Tariff and DOS Rate Sheets, Tariff Terms & Conditions, and DOS Appendix A



Comment period:	<b>Sept. 7, 2021 to Sept. 21, 2021</b>	Contact:	Mark McGillivray
Comments from:	ENMAX Corporation	Phone:	
Date:	2021/09/17	Email:	<a href="mailto:MMcGillivray@enmax.com">MMcGillivray@enmax.com</a>

## Instructions:

1. Please fill out the section above as indicated.
2. Please respond to the questions below and provide your specific comments.
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4. Email your completed comment matrix to [tariffdesign@aeos.ca](mailto:tariffdesign@aeos.ca) by **Sept. 21, 2021**.

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Note that the AESO is seeking feedback as to whether the rate sheets and other revisions to the ISO Tariff are clear and effectively reflect the AESO's Preferred Rate Design and the Modernized DOS design as presented during Stakeholder Sessions 5, 5B (DOS), 6A and 6B. The AESO appreciates all of the feedback it has previously received regarding the Preferred Rate Design and Modernized DOS and will not be considering additional comments on the rate design at this time.

Questions		Stakeholder Comments
1.	<p><b>Tariff Rate Sheets</b></p> <p>(i) Do you believe the AESO's revisions in the proposed draft provide clarity and are effective as written? Why or why not.</p> <p>(ii) Are there additional details that need to be included? If yes, please be specific.</p> <p>(iii) Is anything missing? If yes, please be specific.</p>	No comment at this time. ENMAX will have more information once the AESO files its application for a new Tariff with the AUC.
2.	<p><b>Tariff Terms &amp; Conditions</b></p>	No comment at this time. See response to Question #1.

Questions	Stakeholder Comments
<ul style="list-style-type: none"> <li>(i) Do you believe the AESO's revisions in the proposed draft provide clarity and are effective as written? Why or why not.</li> <li>(ii) Are there additional details that need to be included in this authoritative document? If yes, please be specific.</li> <li>(iii) Is anything missing? If yes, please be specific.</li> </ul>	
<p>3. <b>DOS Rate Sheet</b></p> <ul style="list-style-type: none"> <li>(i) Do you believe the AESO's revisions in the proposed draft provide clarity and are effective as written? Why or why not.</li> <li>(ii) Are there additional details that need to be included in this authoritative document? If yes, please be specific.</li> <li>(iii) Is anything missing? If yes, please be specific.</li> </ul>	<p>No comment at this time. See response to Question #1.</p>
<p>4. <b>DOS Appendix A</b></p> <ul style="list-style-type: none"> <li>(i) Do you believe the AESO's revisions in the proposed draft provide clarity and are effective as written? Why or why not.</li> <li>(ii) Are there additional details that need to be included in this authoritative document? If yes, please be specific.</li> <li>(iii) Is anything missing? If yes, please be specific.</li> </ul>	<p>No comment at this time. See response to Question #1.</p>
<p>5. Would it be helpful for the AESO to develop additional guidance information, potentially in the form of an information document, once the Alberta Utilities Commission makes its decision on the Bulk and Regional Tariff Application? If yes, please specify what additional guidance would be helpful.</p>	<p>Yes, it would be helpful for the AESO to develop additional guidance information in the form of an information document or similar format. For instance, additional clarity on how the demand opportunity service will work for energy storage facilities would be useful to market participants.</p> <p>Seeing as every customer in the province could potentially be impacted by this change in Tariff, we would also expect the AESO to take the lead in developing a</p>



Questions		Stakeholder Comments
		complete communications plan and effort to reach impacted customers so that retailer call centers do not get flooded with questions about changes to their bills.
6.	Additional comments	We recognize that these rate sheets are subject to review by the AUC as part of its upcoming ISO Tariff proceeding and may change depending on the outcomes of that process.

Thank you for your input. Please email your completed matrix to: [tariffdesign@aeso.ca](mailto:tariffdesign@aeso.ca)

# Stakeholder Comment Matrix – Sept. 7, 2021

Bulk and Regional Tariff Design – Tariff and DOS Rate Sheets, Tariff Terms & Conditions, and DOS Appendix A



Comment period:	<b>Sept. 7, 2021 to Sept. 21, 2021</b>	Contact:	Scott Perry
Comments from:	Greengate Power	Phone:	403.519.6194
Date:	2021/09/21	Email:	Scott@greengatepower.com

## Instructions:

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Questions		Stakeholder Comments
1.	<p><b>Tariff Rate Sheets</b></p> <p>(i) Do you believe the AESO's revisions in the proposed draft provide clarity and are effective as written? Why or why not.</p> <p>(ii) Are there additional details that need to be included? If yes, please be specific.</p> <p>(iii) Is anything missing? If yes, please be specific.</p>	<p>(i) Greengate finds the AESO's revisions provided more clarity. However, it is not clear how the ancillary services charge will be made separate from the DOS rate. Can the AESO please provide the associated rates for ancillary services charge and the updated DOS rate?</p> <p>(ii) N/A</p> <p>(iii) N/A</p>
2.	<p><b>Tariff Terms &amp; Conditions</b></p>	<p>(i) Several areas require more clarity. Greengate's impression of DOS terms from the AESO stakeholder sessions did not clearly indicate that the consequence of being found to be DOS ineligible would lead to the Market Participant being charged</p>

Questions	Stakeholder Comments
<p>(i) Do you believe the AESO's revisions in the proposed draft provide clarity and are effective as written? Why or why not.</p> <p>(ii) Are there additional details that need to be included in this authoritative document? If yes, please be specific.</p> <p>(iii) Is anything missing? If yes, please be specific.</p>	<p>at rate DTS on past consumption under DOS. This could likely lead to a Market Participant being charged a significant penalty, long after consumption has occurred. The rules for eligibility and audit for DOS are unclear and mostly undefined. Furthermore, it is not clear how and to what level of stringency the AESO will evaluate the eligibility of participants before they are permitted to use DOS. It is highly recommended that the AESO clearly define pre-qualification and the AESO's policies and practices in monitoring pre-qualification. As it currently written, the lack of clarity will inhibit firms such as Greengate from using this rate for its storage projects.</p> <p>(ii) The section 9.6(1) appears to indicate that a non-compliant DOS participant would need to repay some metered energy at rate DTS, that the volume of the DOS and DTS contracts could change, and that the participant would lose access to DOS. Clarity on this approach is needed as it introduces substantial risk if the AESO does not evaluate the eligibility of a market participant before they begin using DOS. The test for determining that rate DTS is uneconomic needs clarity on how the estimate is required to be calculated.</p> <p>Greengate supports changes suggested by CanREA, that would put the burden of proof on the AESO to prove ineligibility and clarify the process:</p> <p>9.6(1) If one or more of the following events has occurred:</p> <ul style="list-style-type: none"> <li>(a) the market participant fails to respond to a dispatch or directive from the ISO;</li> <li>(b) the market participant's use of the demand opportunity service exceeds the demand opportunity service contract capacity.</li> <li>(c) the market participant's use of the demand opportunity service exceeds the maximum annual load factor that the ISO determines in accordance with Rate DOS; or</li> <li>(d) The market participant no longer has a system access service agreement for Rate DTS,</li> </ul> <p>the ISO may investigate the market participant's reasons why the event in (i)-(iv) occurred.</p>

Questions	Stakeholder Comments
	<p>(2) The investigation in (1) shall include notice to the market participant and a reasonably opportunity for the market participant to explain the circumstances.</p> <p>(3) Following its investigation, the ISO may deem the market participant to have misrepresented its use of Rate DOS under the ISO tariff and the system access service agreement for Rate DOS if, following consideration of the market participant's reasons, the ISO</p> <p>(a) confirms that one or more of the events in (1)(a)-(d) has occurred; and,</p> <p>(b) concludes that the market participant no longer meets the eligibility criteria in section 9.3.</p> <p>Furthermore, missing a dispatch may be a relatively minor infraction as compared to not meeting the eligibility criteria. Greengate recommends that the AESO create standards and consequences that clearly reflect the severity of an infraction and not treat each infraction with a significant penalty. Potentially the AESO could use a stepped approach, with less severe consequences for less serious infractions.</p>
<p>3. <b>DOS Rate Sheet</b></p> <p>(i) Do you believe the AESO's revisions in the proposed draft provide clarity and are effective as written? Why or why not.</p> <p>(ii) Are there additional details that need to be included in this authoritative document? If yes, please be specific.</p> <p>(iii) Is anything missing? If yes, please be specific.</p>	<p>(i) More clarity is needed on the losses charge in 3(2)(b). In Greengate's view, it is only reasonable to charge losses in this way if the market participant would also receive credits if located in an area where a generator would be charged for losses, and vice versa. For storage this would mean that a storage facility using DOS in an area with a 5% loss factor would pay 5% losses on discharges, but receive a 5% credit, or another calculated amount, upon charging.</p>
<p>4. <b>DOS Proforma Agreement</b></p>	

Questions	Stakeholder Comments
(i) Do you believe the AESO's revisions in the proposed draft provide clarity and are effective as written? Why or why not. (ii) Are there additional details that need to be included in this authoritative document? If yes, please be specific. (iii) Is anything missing? If yes, please be specific.	
5. Would it be helpful for the AESO to develop additional guidance information, potentially in the form of an information document, once the Alberta Utilities Commission makes its decision on the Bulk and Regional Tariff Application? If yes, please specify what additional guidance would be helpful.	Greengate supports CanREA's suggestion that an information document should clarify that energy storage resources definitively will qualify for DOS in sections 9.3(1), 9.3(2), and 9.3(3). However, if the AESO intends to do this, it would be best if they indicated this at the earliest point in time, even if this means the AESO provides it in comments during the Tariff Application, to provide some certainty about this rate to investors and developers. This type of statement would help to alleviate Greengate's concerns on the AESO's DOS terms and conditions.
6. Additional comments	

Thank you for your input. Please email your completed matrix to: [tariffdesign@ieso.ca](mailto:tariffdesign@ieso.ca)

# Stakeholder Comment Matrix – Sept. 7, 2021

Bulk and Regional Tariff Design – Tariff and DOS Rate Sheets, Tariff Terms & Conditions, and DOS Appendix A



Comment period:	<b>Sept. 7, 2021 to Sept. 21, 2021</b>	Contact:	Richard Penn
Comments from:	Industrial Power Consumers Association of Alberta (IPCAA)	Phone:	403-903-7693
Date:	2021/09/20	Email:	Richard.Penn@IPCAA.ca

## 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 comment matrix per organization.**
4. Email your completed comment matrix to [tariffdesign@aeso.ca](mailto:tariffdesign@aeso.ca) by **Sept. 21, 2021**.

The AESO values stakeholder feedback and invites all interested stakeholders to provide their comments on the proposed drafts of the Bulk and Regional Preferred Rate Design and Modernized Demand Opportunity Service (DOS) design: Tariff Rate Sheets, Tariff Terms & Conditions, DOS Rate Sheet, and DOS Proforma Agreement. Please be as specific as possible with your responses. Thank you.

Note that the AESO is seeking feedback as to whether the rate sheets and other revisions to the ISO tariff are clear and effectively reflect the AESO's Preferred Rate Design and the Modernized DOS design as presented during Stakeholder Sessions 5, 5B (DOS), 6A and 6B. The AESO appreciates all of the feedback it has previously received regarding the Preferred Rate Design and Modernized DOS and will not be considering additional comments on the rate design at this time.

Questions	Stakeholder Comments
<p>1. <b>Tariff Rate Sheets</b></p> <p>(i) Do you believe the AESO's revisions in the proposed draft provide clarity and are effective as written? Why or why not.</p> <p>(ii) Are there additional details that need to be included? If yes, please be specific.</p> <p>(iii) Is anything missing? If yes, please be specific.</p>	<p>IPCAA thanks the AESO for providing draft Tariff Rate Sheets. The Tariff Rate Sheets, as drafted, follow the AESO's proposed tariff. IPCAA's concerns relate to the proposed tariff, not the rate sheets.</p> <p>IPCAA notes that the total cost of operating reserves will now also be allocated to Rate DOS, Rate XOS and Rate XOM. That point was not fully addressed during the tariff consultations to date.</p> <p>Question (i): No comment at this time.</p>

Questions	Stakeholder Comments
	<p>Question (ii): IPCAA notes that in Section 4(2) there is an X% set if the OR charge must be estimated. IPCAA would like to understand how the X% is determined. We assume that its derivation will be included in the upcoming AUC proceeding.</p>
<p>2. <b>Tariff Terms &amp; Conditions</b></p> <p>(i) Do you believe the AESO's revisions in the proposed draft provide clarity and are effective as written? Why or why not.</p> <p>(ii) Are there additional details that need to be included in this authoritative document? If yes, please be specific.</p> <p>(iii) Is anything missing? If yes, please be specific.</p>	<p>IPCAA thanks the AESO for providing draft Tariff Terms &amp; Conditions.</p> <p>Question (i): For the most part, the AESO's revisions provide clarity; however, we offer the following comments:</p> <ul style="list-style-type: none"> <li>In ISO Tariff – Section 5, paragraph 5.3(7): IPCAA appreciates the opportunity for a load to reduce its Rate DTS contract within the contract adjustment period, which is to be determined in the proceeding. This change is long overdue and will help right-size load contracts and in aggregate right-size Alberta's new transmission requirements.</li> <li>In ISO Tariff – Section 9, paragraph 9.2(4): It would be helpful to better understand the analysis that will go into establishing the maximum annual load factor.</li> <li>In ISO Tariff – Section 9, paragraph 9.3(4): IPCAA appreciates the expansion of rate DOS to specifically include unplanned and forced outages as a reason to utilize Rate DOS.</li> </ul> <p>Question (ii): With regard to additional details that need to be included in this authoritative document, IPCAA provides the following comment:</p> <ul style="list-style-type: none"> <li>In ISO Tariff – Section 9: paragraph 9.4(1) It is not clear how a participant must bid for additional energy for a forced outage under Rate DOS. The Tariff requirement should include an ability to submit a bid as soon as possible after a forced outage.</li> </ul> <p>Question (iii): IPCAA believes a mechanism is needed to bid for Rate DOS after a forced outage is required. A load cannot anticipate the need for Rate DOS ahead of time in the case of a forced outage.</p>
<p>3. <b>DOS Rate Sheet</b></p>	<p>Question (i): For the most part, the AESO's revisions provide clarity; however, we offer the following comments:</p> <ul style="list-style-type: none"> <li>In the DOS Rate Sheet Section 2(3): the AESO has chosen 0.2 as the maximum annual load factor. IPCAA is concerned with the process used to establish this</li> </ul>

Questions	Stakeholder Comments
(i) Do you believe the AESO's revisions in the proposed draft provide clarity and are effective as written? Why or why not. (ii) Are there additional details that need to be included in this authoritative document? If yes, please be specific. (iii) Is anything missing? If yes, please be specific.	value and submits that the value should be determined during the AUC Proceeding. <ul style="list-style-type: none"> <li>In the DOS Rate Sheet, the Rate DOS DTS surcharge rate referred to in Section 2(2) b is not clear.</li> <li>In the DOS Rate Sheet: it is not clear why the AESO should be purchasing operating reserves for DOS Dispatchable. The AESO should consider removing it from the OR calculation if it is dispatched off prior to OR utilization.</li> </ul> For questions (ii) and (iii), IPCAA has no comments at this time, other than what is listed in question (i) above.
4. <b>DOS Proforma Agreement</b> (i) Do you believe the AESO's revisions in the proposed draft provide clarity and are effective as written? Why or why not. (ii) Are there additional details that need to be included in this authoritative document? If yes, please be specific. (iii) Is anything missing? If yes, please be specific.	No comment at this time.
5. Would it be helpful for the AESO to develop additional guidance information, potentially in the form of an information document, once the Alberta Utilities Commission makes its decision on the Bulk and Regional Tariff Application? If yes, please specify what additional guidance would be helpful.	IPCAA agrees that an information document would be helpful – and it would be more helpful if it is provided as a draft in advance of the AUC proceeding to ensure everyone fully understands the proposed rates and terms & conditions. A full and complete guidance document explaining DOS will be required.
6. Additional comments	N/A

Thank you for your input. Please email your completed matrix to: [tariffdesign@ieso.ca](mailto:tariffdesign@ieso.ca)



# Stakeholder Comment Matrix – Sept. 7, 2021

Bulk and Regional Tariff Design – Tariff and DOS Rate Sheets, Tariff Terms & Conditions, and DOS Appendix A



Comment period:	<b>Sept. 7, 2021 to Sept. 21, 2021</b>	Contact:	Luis Pando
Comments from:	TransAlta Corporation	Phone:	(403) 267-3627
Date:	2021/09/21	Email:	Luis_Pando@transalta.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 comment matrix per organization.**
4. Email your completed comment matrix to [tariffdesign@aeso.ca](mailto:tariffdesign@aeso.ca) by **Sept. 21, 2021**.

The AESO values stakeholder feedback and invites all interested stakeholders to provide their comments on the proposed drafts of the Bulk and Regional Preferred Rate Design and Modernized Demand Opportunity Service (DOS) design: Tariff Rate Sheets, Tariff Terms & Conditions, DOS Rate Sheet, and DOS Proforma Agreement. Please be as specific as possible with your responses. Thank you.

Note that the AESO is seeking feedback as to whether the rate sheets and other revisions to the ISO tariff are clear and effectively reflect the AESO's Preferred Rate Design and the Modernized DOS design as presented during Stakeholder Sessions 5, 5B (DOS), 6A and 6B. The AESO appreciates all of the feedback it has previously received regarding the Preferred Rate Design and Modernized DOS and will not be considering additional comments on the rate design at this time.

Questions	Stakeholder Comments
<p>1. <b>Tariff Rate Sheets</b></p> <p>(i) Do you believe the AESO's revisions in the proposed draft provide clarity and are effective as written? Why or why not.</p> <p>(ii) Are there additional details that need to be included? If yes, please be specific.</p> <p>(iii) Is anything missing? If yes, please be specific.</p>	<p>We appreciate the AESO providing blacklined versions of the drafts to aid market participants in identifying the proposed changes. The changes proposed by the AESO in the preferred rate design are reflected in most of the rate sheets including changes to the calculation of the connection charge. We note that most of the changes to the DTS rate sheet relate to the settlement period of coincident metered demand which includes the change from the average 15-minute interval to a one-hour interval.</p> <p>We wish to clarify the averaging approach proposed in subsection 3(4) for the DTS rate, which proposes four-year averaging versus the five-year average that the AESO discussed in its consultation. More specifically, we would like to understand why the AESO has changed the number of periods that it will use to determine the average. We also request the AESO contemplate the use of another approach such as the use of a class average coincident metered demand value in instances where the data set is less than 4 years of data. Furthermore, we propose the following grammatical</p>

Questions	Stakeholder Comments
	<p>correction to paragraph 3(4)(a): “the four most recent coincident metered demand values obtained pursuant to subsection 3(3), if there were at least four values <del>were</del> obtained” (strikethrough added).</p> <p><b>Adding Rates DOS, XOS, and XOM to the operating reserves charge should be based upon cost causation.</b></p> <p>Under the existing rates, the ISO adds an operating reserve charge “when the transaction requires the ISO to procure incremental operating reserves, incremental system support services or both”. This requirement specifically identifies the need for a cost causation linkage before an operating reserve charge is included. Under the AESO’s proposed language, an operating reserve charge is added even if the ISO has no incremental requirement to procure operating reserves or system support services. We disagree with this change and recommend that the operating reserve charge still be conditioned upon a requirement of the ISO to procure incremental operating reserves and/or system support services.</p>
<p>2. <b>Tariff Terms &amp; Conditions</b></p> <p>(i) Do you believe the AESO’s revisions in the proposed draft provide clarity and are effective as written? Why or why not.</p> <p>(ii) Are there additional details that need to be included in this authoritative document? If yes, please be specific.</p> <p>(iii) Is anything missing? If yes, please be specific.</p>	<p><b>TransAlta disagrees with the additional requirements for market participants requesting DOS and the inclusion of unnecessary penalties and enforcement provisions in head of the ISO through the terms &amp; conditions (T&amp;Cs).</b></p> <p>The requirement for a DOS holder to also hold a DTS contract is unnecessary and should be removed. A load customer should have the option to exclusively contract for DOS without holding a DTS contract. We believe that an appropriately designed DOS rate embeds the risk through priority of service and ensures fair cost allocation without the need for the customer to also contract for an unneeded amount of DTS. As stated during consultation, the AESO would permit a market participant to contract for a minimal amount &lt;1 MW of DTS, which obviates any significant benefit towards addressing the AESO’s expressed concerns about “DTS cannibalization”. Furthermore, we see the AESO’s concern as unfounded and misplaced in that if the DOS rates are truly reflective of cost causation there is no grounds to conflate a choice for DOS as cannibalization DTS. In fact, viewing prevention of “DTS cannibalization” as a legitimate outcome biases the AESO to not propose any real alternative to the DTS rate.</p> <p>Additionally, we view the AESO’s proposed changes including a representation that it complies with Rate DOS eligibility, a maximum annual load factor, bidding and dispatching rules as addressing any real concerns about DOS misuse. We note that the consequence of misuse carries significant consequences including disqualification from future access to DOS and ex-post investigation of potential misuse or</p>

Questions	Stakeholder Comments
	<p>misrepresentation. All of these requirements more than covers of any risk without the need to impose an unnecessary requirement on the customers to hold a DTS contract. We recommend eliminating this requirement (paragraph 9.2(3)(d) and 9.6(1)(d)) and simply leave market participants to bear the risk, which is consistent with a <i>Fair, Efficient and Open Competition Regulation</i> and the energy market design.</p> <p>Furthermore, we do not understand the need for the changes proposed in paragraph 9.3(4) which requires that all additional energy under DOS must be used for planned or unplanned outages or derates of generating units. These are restrictive and onerous requirements that limit the value and benefit of DOS for energy storage and could have the unintended consequence of sterilizing the efficient utilization of the transmission system. Customers should be able to freely determine when they utilize DOS subject to the constraint of interruptibility.</p> <p>We do not understand what is the authority that the AESO has under the current statutory framework to direct through changes to section 9.3(4) of the terms and conditions, that all additional energy under DOS dispatchable must be used for planned or unplanned outages or derates of generating units. These decisions should be only made by the market participant and the ISO should only intervene through an assessment of the representation of DOS use.</p> <p>We also question the need for adding in a requirement for annual determination of each market participant's maximum annual load factor limit. Notably, the regarding eligibility and qualification criteria for Rate DOS do not require market participants to qualify on an annual basis for DOS. We see no purpose in adding the annual determination requirement and view this as unnecessary red tape that should be removed.</p> <p>We ask the AESO to clarify the following:</p> <ol style="list-style-type: none"> <li>1. Clarify the bidding, dispatching and settlement rules, particularly about the specific ISO Rules that apply to these transactions, and the requirement to bid in section 9.4.</li> <li>2. What is the envisioned process for a market participant to demonstrate to the ISO that it is still eligible for rate DOS?</li> <li>3. Please provide an indicative timeline for its intended practices with respect to terminating a DOS contracting and retroactively charging the customers under another rate.</li> </ol>

Questions	Stakeholder Comments
	<p>4. Why is subsection 9.6(6) applied at the market participant or affiliate level rather than the facility level? The severity of the penalty, not permitting a market participant or any of its affiliates from accessing DOS even on another facility, if it was deemed to have misrepresented its use of DOS or becomes ineligible for DOS. We recommend that this subsection be redrafted to restrict the market participant or an affiliate from re-applying for DOS at that facility (not as a blanket prohibition).</p>
<p>3.</p> <p><b>DOS Rate Sheet</b></p> <p>(i) Do you believe the AESO's revisions in the proposed draft provide clarity and are effective as written? Why or why not.</p> <p>(ii) Are there additional details that need to be included in this authoritative document? If yes, please be specific.</p> <p>(iii) Is anything missing? If yes, please be specific.</p>	<p><b>The modernized DOS rate sheet is an improvement but falls short of being suitable to energy storage because it is inheriting the flaws of the old DOS design.</b></p> <p>We recommend reviewing the following:</p> <ol style="list-style-type: none"> <li>1. The DOS rate sheet in section 2(1) refers to the maximum annual load factor <b>balance</b>. Then in section 2(3) it requires the ISO to calculate each market participant's maximum annual load factor <b>limit</b>. There is no explanation about the difference between "balance" and "limit" and whether the AESO will do a calculation of both. With respect to the maximum annual load factor limit, it is unclear what calculation will be used by the ISO for the first year of the application.</li> <li>2. The proposed draft of section 2(2)(b) is not clear, especially the use of the concept of Rate DOS DTS surcharge. Please explain what this charge is, how it is calculated and the rationale for applying this charge.</li> <li>3. Section 3 reflect the changes to the Rate DOS types, but it is unclear why subsection (3) makes the operating reserve charge mandatory for DOS.</li> </ol>
<p>4.</p> <p><b>DOS Proforma Agreement</b></p> <p>(i) Do you believe the AESO's revisions in the proposed draft provide clarity and are effective as written? Why or why not.</p> <p>(ii) Are there additional details that need to be included in this authoritative document? If yes, please be specific.</p>	<p>See our answer to 2 and 3 above.</p>

Questions		Stakeholder Comments
	(iii) Is anything missing? If yes, please be specific.	
5.	Would it be helpful for the AESO to develop additional guidance information, potentially in the form of an information document, once the Alberta Utilities Commission makes its decision on the Bulk and Regional Tariff Application? If yes, please specify what additional guidance would be helpful.	Yes, the AESO should develop information documents for the modernized DOS explaining how the new bidding, settlement and dispatching will work, the process to determine eligibility and qualification, the process, timelines, and evaluation/decision criteria that are considered/applied to determine DOS misuse or considering a market participant's dispute of an ISO's determination of DOS misuse (how is fairness ensured), the methodology for the calculation of the maximum annual load factor.
6.	Additional comments	Changes to regulation, particularly those that add requirements to market participants, seem counterintuitive in a time when the government is leading a Red Tape Reduction initiative. We consider that a truly modernized DOS should eliminate unnecessary requirements instead of creating new ones, otherwise it will fail to pass the test the government has established to measure red tape reductions.

Thank you for your input. Please email your completed matrix to: [tariffdesign@ieso.ca](mailto:tariffdesign@ieso.ca)