<u>Stakeholder Comment Matrix – September 23, 2020</u> Request for feedback on sub-hourly settlement, session 3 material



Period of Comment: September 23, 2020 through October 7, 2020

Comments From: Canadian Renewable Energy Association

Date: 2020/09/30

Contact:
Phone:
Email:

The AESO is seeking comments from stakeholders on its approach to reviewing sub-hourly settlement, and content from session 3.

- 1. Please fill out the section above as indicated.
- 2. Please respond to the questions below and provide your specific comments.
- 3. Email your completed matrix to stakeholder.relations@aeso.ca by October 7, 2020
- 4. Stakeholder comments will be published to aeso.ca, in their original state, with personal or commercially sensitive information redacted, following October 7, 2020.

	Questions	Stakeholder Comments
1.	The AESO has presented the costs and benefits on sub-hourly settlement. Do you believe there are other considerations that should have been considered? Do you have comments related to the material the AESO presented? If yes, please elaborate.	
2.	The AESO's decision is to not pursue sub-hourly settlement at this time. Do you have comments related to this decision?	The Canadian Renewable Energy Association supports the AESO's decision to not pursue the introduction of a sub-hourly settlement process at this time. It had been our position that the change would not incent sufficient gains in relation to the investor confidence issues that would be introduced by changes to market rules.
3.	Do you think there is value in further exploring payment to load on the margin given the benefits and issues identified? If yes, please describe if you would be willing to participate and what topics should be explored and why.	
4.	Do you feel you have been able to adequately participate and provide comments to the AESO through this engagement? If no, please describe your concerns.	We appreciate the AESO's transparency as they have developed their analysis of the impacts of a switch to a sub hourly settlement basis. The AESO's presentations of their modelling approach and assumptions were clear and helpful, and it is appreciated that feedback from session 2 was reflected in the modelling that had been prepared for Session 3.
		However, we do note that the stakeholder comment summary did not reflect previous CanREA comments regarding the investor confidence impacts of the consideration of rule reforms. This is relevant as it would be beneficial to better understand the AESO's interpretation of and accounting for this concern.
5.	Do you believe the AESO was effective in the preparation and presentation of the material? If no, please provide suggestions for the improvement of future	As mentioned above, the presentation of the material was largely very helpful and provided context for and explanation of the work that had been done on this file.
	engagements.	



	Questions	Stakeholder Comments
6.	Please provide any other comments you have related to the sub-hourly settlement engagement.	In previous responses, we have mentioned that the presentation did not provide adequate support for why the AESO felt that the proposed reforms where necessary. However, in the "Planning Ahead" section on the "Conclusion" slide, it is mention that "this market design may be pursued in the future." We request more information detailing which market outcomes would result in further consideration of sub-hourly settlement.

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