<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: TransCanada Energy Ltd. (TCE)

Date: 2020/10/07

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.	TCE believes that the scope of the cost-benefit analysis was reasonable. Considering the magnitude of the benefits, it does not seem likely that increasing the scope of the analysis would make a material difference to the results.
2.	The AESO's decision is to not pursue sub-hourly settlement at this time. Do you have comments related to this decision?	Considering the cost-benefit analysis, TCE supports the decision to not pursue sub-hourly settlement (SHS) at this time. However, if the costs associated with implementing and operating SHS were to diminish in the future, TCE submits that it would be reasonable for the AESO to revisit this decision.
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.	Yes, TCE supports exploring payment to a load on the margin provided that the design being considered is symmetrical to the payment to a supplier on the margin. TCE notes that one limitation of the current design for the payment to a supplier on the margin is that the payment is based off of the supplier's offer price rather than the system marginal price. Symmetrical treatment for the payment to a load on the margin would charge loads based on their bid price and not on the relevant system marginal price. As a consequence, load will be charged more than the average of the system marginal price for when they were operating resulting in a less efficient price signal. If payment to a load on the margin is to be further considered, TCE recommends that the AESO also consider possible efficiency improvements that could be implemented.
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.	Yes.
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 engagements.	Yes.
6.	Please provide any other comments you have related to the sub-hourly settlement engagement.	TCE has no further comments at this time.



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