

## Stakeholder Comment Matrix – Feb 25, 2020

### Request for feedback on sub-hourly settlement, session 1 material



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| <b>Period of Comment:</b> Feb. 25, 2020 through Mar. 13, 2020<br><b>Comments From:</b> City of Lethbridge<br><b>Date:</b> 2020/03/13 | <b>Contact:</b> [REDACTED]<br><b>Phone:</b> [REDACTED]<br><b>Email:</b> [REDACTED] |
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The AESO is seeking comments from stakeholders on its approach to reviewing sub-hourly settlement, and content from Session 1.

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](mailto:stakeholder.relations@aeso.ca) by Mar. 13, 2020
4. Stakeholder comments will be published to [aeso.ca](http://aeso.ca), in their original state, with personal or commercially sensitive information redacted, following Mar. 13, 2020.

|    | Questions   | Stakeholder Comments   |
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| 1. | Please describe why you are interested in sub-hourly settlement and how it affects your business.   | City of Lethbridge Electric Utility is not interested in sub-hourly settlement at this time. The effect of sub-hourly settlement would only impact our DIM customers at this time. |
| 2. | Is your organization a load, supplier, both a load and supplier, a billing agent, or other. If other, please describe.  | Other – Wire Service Provider  |
| 3. | The AESO has described the scope for this process, general agenda items and timing for upcoming stakeholder engagements. Please describe if you believe the scope is appropriate. If not, please describe/provide your rationale. | No Comment   |
| 4. | At the session, the AESO outlined the objectives of the sub-hourly settlement, which was to improve price fidelity and incent flexibility. Do you have any comments on the objectives of the sub-hourly settlement engagement?    | The City of Lethbridge Electric Utility does not have any comments on the objectives at this time.   |

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| 5. | <p>Are there considerations other than the following that should be taken into account to determine the value in moving to sub-hourly settlement interval?</p> <ul style="list-style-type: none"> <li>• The expected enhancement in price fidelity and flexibility</li> <li>• The expected financial impact on loads and generators</li> <li>• Implementation costs for the AESO and market participants</li> <li>• Timing required to transition to a sub-hourly settlement interval</li> </ul> | <p>City of Lethbridge Electric Utility can only think of timing from Measurement Canada to get approved meters for billing purposes that need to be in place in order to move to sub-hourly settlement interval. Electric Utility is thinking of all customers moving to sub-hourly during the discussion of this engagement.</p>   |
| 6. | <p>Please describe the size of your business in the approximate total MWhs consumed or produced in 2019.</p>   | <p>838,622 MWhs</p>   |
| 7. | <p>Do you currently have interval metering installed in your operations?<br/>If yes, please describe the approximate volume of your business that was measured using interval meters in 2019.</p>  | <p>The City of Lethbridge Electric Utility has interval meters in place for all customers within our service area. Our meters have the ability to collect revenue from DCM and DIM files. DIM customers total 95 of our total of 41,818 customers. We are collecting DIM data for our total of 41,818 customers but only are using the data for engineering purposes at the moment and not billing purposes.</p>  |
| 8. | <p>Can you identify which of the following elements will be affected by the implementation of sub-hourly settlements at <b>five-minute intervals</b>?</p> <ul style="list-style-type: none"> <li>• Metering</li> <li>• IT systems</li> <li>• Data storage</li> <li>• Other</li> </ul>  | <p>All that you have listed will be affected by the implementation of sub-hourly settlements. Another element to consider is the effect this will have on Measurement Canada in order to make sure that meters are in place for the implementation of sub-hourly settlements. Also within the City of Lethbridge, the perception of changing meters again, as we just finished our meter infrastructure upgrade in 2017. This will lead to taxing other resources within the City of Lethbridge, communications department for example.</p> |
| 9. | <p>For each of the elements listed in question 8 above, please describe the changes that would be required for your business.</p>  | <ul style="list-style-type: none"> <li>• Metering – changing of POD meters/all customer meters</li> <li>• IT Systems – upgrading of servers/software/MDM/LSA</li> <li>• Data Storage – upgrading of servers for LEU/MDM/LSA</li> <li>• Other – communication to customers/Measurement Canada</li> </ul>   |

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| 10.<br>11. | The AESO is looking to understand the magnitude of costs during this initial phase. For each of the elements listed in question 8 above, please provide estimates of the cost required to implement these changes. If you are unable to provide cost estimates, please indicate when you can do so.  | City of Lethbridge Electric Utility is unable to provide cost estimates for any of the elements at this time. We would require a timeline of approximately 6 to 12 months to gather the information required for providing estimates to implement the changes needed for moving to sub-hourly settlement.  |
| 12.        | For each of the elements listed in question 8 above, please describe the timing required to implement these changes.   | <ul style="list-style-type: none"> <li>• Metering – 5-10 years, as we would like to time it to match our seal extension schedule, try to mitigate mass rollout like our last meter change.</li> <li>• IT Systems – 12 months</li> <li>• Data Storage – 12 months</li> <li>• Other – unsure at this time (need to have some discussions for contracts)</li> </ul> |
| 13.        | Can you identify which of the following elements will be affected by the implementation of sub-hourly settlements at <b>15-minute intervals</b> ? <ul style="list-style-type: none"> <li>• Metering</li> <li>• IT systems</li> <li>• Data storage</li> <li>• Other</li> </ul>  | City of Lethbridge Electric Utility expects all elements will be affected by the implementation of sub-hourly settlements.   |
| 14.        | For each of the elements listed in question 12 above, please describe changes that would be required for your business.  | Please see question no. 9  |
| 15.        | The AESO is looking to understand the magnitude of costs during this initial phase. For each of the elements listed in question 12 above, please provide estimates of the cost required to implement these changes. If you are unable to provide cost estimates by the end of the comment period (March 13, 2020), please indicate when you can do so. | Please see question no. 10   |
| 16.        | For each of the elements listed in question 12 above, please describe the timing required to implement these changes.  | Please see question no. 11   |

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| 17. | The AESO has described some challenges that may impact market participants. Are there other challenges that have not been identified that are unique to the market participant or in general?  | City of Lethbridge Electric Utility does not see any other challenges at this time. We can only recommend communication with Measurement Canada on the plans to move to sub-hourly settlement.                                |
| 18. | Should sub-hourly settlement apply to all market participants? Is it fair for sub-hourly settlement to only apply to a subset of market participants?  | City of Lethbridge Electric utility believes that sub-hourly settlement should apply to all market participants and that it is not fair for only a subset of market participants to participate in the sub-hourly settlement. |
| 19. | Does payment to suppliers on the margin (PSM) sufficiently incent generator response without sub-hourly settlement? If we move to sub-hourly settlement, is PSM still required to address the mismatch between settlement and dispatch interval?   | No Comment  |
| 20. | Are there any other benefits that have not been identified? Please elaborate.  | City of Lethbridge Electric Utility does not know of any other benefits at this time.   |
| 21. | Is the approach used for this engagement effective? If no, please provide specific feedback on how the AESO can make these sessions more constructive.   | City of Lethbridge Electric Utility does not have a problem with the approach for this engagement at this time.   |
| 22. | The AESO seeks to be transparent through this stakeholder engagement process and would like to publish all information as received. Is the information provided in this feedback suitable to be published by the AESO on aesoc.ca? If no, please indicate the sections of your response that should be redacted? | Yes the information is suitable to be published by AESO.  |
| 23. | Please provide any other comments you have related to the sub-hourly settlement engagement.  | City of Lethbridge Electric Utility does not have any other comments at this time.  |

Thank you for your input. Please email your comments to: [stakeholder.relations@aesoc.ca](mailto:stakeholder.relations@aesoc.ca).