## Stakeholder Comment Matrix – June 10, 2020 DER Roadmap



| Date of Request for Comment: June 10, 2020  Period of Consultation: June 10, 2020 through July 10, 2020 | Contact: |
|---|----------|
| Comments From: ENMAX Corporation  | Email:   |
| Date [yyyy/mm/dd]:  |          |

## Instructions:

- 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 comment matrix to stakeholderrelations@aeso.ca by July 10, 2020.

The AESO is seeking comments from Stakeholders with regard to the following matters:

| Question   | Answer   |
|--|--|
| Did you identify any content gaps in the <i>DER Roadmap?</i> If yes, please explain. | ENMAX Corporation (ENMAX) is responding to the AESO on behalf of ENMAX Power Corporation and notes that current DER penetration is low and will have negligible impact on overall transmission capacity in the near to medium term. As a result, the timing of a coordinated distribution and transmission planning framework for a two-way electricity flow (over what is currently already in place) is premature.   |
|  | Responding to customer preferences and adapting to changing technology is a goal for ENMAX and we remain committed to further dialogue with the AESO to ensure distribution and transmission systems remain safe and reliable. That said, it is important to note that while the transmission system is interconnected, due to the uniqueness of each DFO service territory, distribution systems are independently managed across the province with appropriate regulatory oversight.   |
|  | The AESO has a mandate to oversee the Alberta Interconnected Electric System (AIES) at the transmission level. However, at the distribution level, regional variations in customer needs have resulted in distribution systems that are tailored to best reflect those needs. With respect to current and future system planning, DFO's have a mandate under Section 105(1)c of the <i>Electric Utilities Act</i> , to take all reasonable measures available to ensure the continued safe and reliable operation of its system. |



| Did you find value in the publication of the <i>DER Roadmap</i> ? Would any additional information be helpful? How can it be improved?   | Until clear policy direction is provided by the Government of Alberta (GoA) and changes are codified in Regulation, the extent of change under the existing regulatory framework will remain limited.  In the future, it will be important to prioritize the types of DER technology that have the most impact on the transmission system, and focus analysis and resources accordingly.  ENMAX looks forward to participating in each of the consultations that make up the AESO's DER Roadmap and expects that the roadmap and its timelines will evolve as a result of stakeholder views.   |
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| Do you have suggested changes to the activity timing in the <i>DER Roadmap</i> Integrated Plan? If yes, please be specific to why you would like to see the timing changed and what the suggested timing should look like. | The AESO indicated that it will publish a detailed 2020/2021 Plan for DER Integration Activities.  ENMAX notes that there is significant overlap with other key initiatives, some of which have not yet concluded (AUC Distribution System Inquiry), have been delayed (ISO Bulk and Regional Tariff Design) or not yet started (review of Transmission Regulation). Furthermore, the integration of DERs on the AIES will rely on future policy direction from the GoA and will depend on the objectives identified in government policy. Until such clarity is provided, the AESO's DER Roadmap should not introduce significant changes to the existing framework (including any new requirements that introduce unnecessary costs or additional red tape) but could work to inform the industry of the challenges ahead. |
| Are you aware of any recent DER research/resources/information that would provide the AESO more insight on this topic? If yes, please provide details or explain.  | The AUC has indicated that it will issue a final report on the Distribution System Inquiry in early fall 2020. Due to the significant overlap, the AUC's report should be referenced to help guide and inform the AESO's DER Roadmap and avoid duplication of work. The actual end product of the AUC's inquiry is yet unclear and it is noted that the AESO has been a participant in that process.   |