

# Stakeholder Proposal Evaluation – May 4, 2020

Participant-Related Costs for DFOs (Substation Fraction) and DFO Cost Flow-Through Technical Session 2A



<b>Period of Comment:</b> May 4, 2020 through May 20, 2020	<b>Contact:</b> [REDACTED]
<b>Comments From:</b> EPCOR Distribution & Transmission Inc.	<b>Phone:</b> [REDACTED]
<b>Date:</b> 2020/05/20	<b>Email:</b> [REDACTED]

## Document purpose

The purpose of this document is to provide a structured and consistent guide to workshop participants to evaluate each of the proposals.

## Instructions

1. Please fill out the section above as indicated.
2. Please complete an evaluation on each of the proposals using the tables below (Tables 2-7). Please provide your reason(s) as to why you think the proposal does/does not meet each of the evaluation criteria.
3. Once you have completed an evaluation on each of the proposals, please choose your preferred proposal with an explanation as to why in Table 1: Overall evaluation.
4. **Please submit one completed evaluation per organization.**
5. Email your completed evaluation to [tariffdesign@aeso.ca](mailto:tariffdesign@aeso.ca) by **May 20, 2020**.

**Table 1: Overall evaluation**

Questions	Stakeholder Evaluation
1. Which proposal did you prefer? Please explain why.	It is EDTI's view that all proposals generally meet the principles as shown in Appendix A of the comment matrix and EDTI does not view any single proposal as preferable to the others. As such, EDTI is not preparing responses specific to the individual proposals.
2. What are the challenges or unresolved questions with your preferred proposal?	It is not clear to EDTI what Principal 4 in Appendix A (i.e. DFOs should be provided with reasonable certainty re: cost treatment/recovery or how the proposals can or should deal with the methods available to DFO's for cost recovery) is referring to or how it has been addressed through the various proposals.
3. What aspects from the other proposals would you like to see applied to your preferred proposal?	See the response to part 1.
4. Additional comments	EDTI believes that all DCG customers should be required to pay the costs to connect to the distribution system including any costs for improvements required at the substation, i.e. transmission system costs, and that DCG customers should not be required to pay future costs other than costs related to the provision of additional service to the DCG. Further, DFOs should have provisions within their respective tariffs to refund portions of a capital contribution paid by one customer for certain capital investments if in the future additional customer benefit from the original capital investments. For example if a DCG customer was required to pay for a capital improvement at a substation and those capital improvement were also used to provide service to a subsequent DCG customer then the second DCG customer should be required to pay a contribution for a portion of the original capital investment proportional to the amount of service required. Moreover, the original DCG should receive a partial refund of the original capital contribution reflecting the shared use. In this way, each DCG customer will pay a fair share of cost of receiving service. Further, EDTI believes that recovery of costs by DFOs from the DFOs customers, whether the costs are flow-through of costs payable by the DFO for DTS service or capital contributions payable by the DFO to a TFO for connection projects, are governed by the DFOs tariff rather than by the AESO tariff. As such, recovery of such costs may need to be dealt with by the DFO in a DFO

Questions	Stakeholder Evaluation
	tariff application process.

**Table 2: Evaluation of Proposal: Canadian Solar Solutions Inc.**

Questions	Stakeholder Evaluation
1. Please rate your support of this proposal on a 1-10 basis, with 10 being completely supportive and 1 being not at all supportive. Please provide your rationale.	
2. Is the proposal an unbiased solution and evenly weighted in its analysis?	
3. Is the proposal feasible?	
4. Which stakeholders are best served by this proposal? Why?	
5. Which stakeholders are least served by this proposal? Why?	
6. Do the objectives/principles outlined in the proposal seem fair and reasonable?	
7. Does the proposal align with the consolidated principles (see Appendix A) presented in Technical Session 1 as well as the additional principle of “Ease of understanding and implementation (simplicity)”? This additional principle was added based on stakeholder feedback.  If not, are you supportive of the principles that are used in the development of the proposal?	
8. What are the unresolved questions or challenges you would want to see answered in this proposal?	
9. Additional comments	

**Table 3: Evaluation of Proposal: DCG Consortium**

Questions	Stakeholder Evaluation
1. Please rate your support of this proposal on a 1-10 basis, with 10 being completely supportive and 1 being not at all supportive. Please provide your rationale.	
2. Is the proposal an unbiased solution and evenly weighted in its analysis?	
3. Is the proposal feasible?	
4. Which stakeholders are best served by this proposal? Why?	
5. Which stakeholders are least served by this proposal? Why?	
6. Do the objectives/principles outlined in the proposal seem fair and reasonable?	
7. Does the proposal align with the consolidated principles (see Appendix A) presented in Technical Session 1 as well as the additional principle of “Ease of understanding and implementation (simplicity)”? This additional principle was added based on stakeholder feedback.  If not, are you supportive of the principles that are used in the development of the proposal?	
8. What are the unresolved questions or challenges you would want to see answered in this proposal?	
9. Additional comments	

**Table 4: Evaluation of Proposal: FortisAlberta Inc.**

Questions	Stakeholder Evaluation
1. Please rate your support of this proposal on a 1-10 basis, with 10 being completely supportive and 1 being not at all supportive. Please provide your rationale.	
2. Is the proposal an unbiased solution and evenly weighted in its analysis?	
3. Is the proposal feasible?	
4. Which stakeholders are best served by this proposal? Why?	
5. Which stakeholders are least served by this proposal? Why?	
6. Do the objectives/principles outlined in the proposal seem fair and reasonable?	
7. Does the proposal align with the consolidated principles (see Appendix A) presented in Technical Session 1 as well as the additional principle of “Ease of understanding and implementation (simplicity)”? This additional principle was added based on stakeholder feedback.  If not, are you supportive of the principles that are used in the development of the proposal?	
8. What are the unresolved questions or challenges you would want to see answered in this proposal?	
9. Additional comments	

**Table 5: Evaluation of Proposal: Lionstooth Energy**

Questions	Stakeholder Evaluation
1. Please rate your support of this proposal on a 1-10 basis, with 10 being completely supportive and 1 being not at all supportive. Please provide your rationale.	
2. Is the proposal an unbiased solution and evenly weighted in its analysis?	
3. Is the proposal feasible?	
4. Which stakeholders are best served by this proposal? Why?	
5. Which stakeholders are least served by this proposal? Why?	
6. Do the objectives/principles outlined in the proposal seem fair and reasonable?	
7. Does the proposal align with the consolidated principles (see Appendix A) presented in Technical Session 1 as well as the additional principle of “Ease of understanding and implementation (simplicity)”? This additional principle was added based on stakeholder feedback.  If not, are you supportive of the principles that are used in the development of the proposal?	
8. What are the unresolved questions or challenges you would want to see answered in this proposal?	
9. Additional comments	

**Table 6: Evaluation of Proposal: Solar Krafte Utilities**

Questions	Stakeholder Evaluation
1. Please rate your support of this proposal on a 1-10 basis, with 10 being completely supportive and 1 being not at all supportive. Please provide your rationale.	
2. Is the proposal an unbiased solution and evenly weighted in its analysis?	
3. Is the proposal feasible?	
4. Which stakeholders are best served by this proposal? Why?	
5. Which stakeholders are least served by this proposal? Why?	
6. Do the objectives/principles outlined in the proposal seem fair and reasonable?	
7. Does the proposal align with the consolidated principles (see Appendix A) presented in Technical Session 1 as well as the additional principle of “Ease of understanding and implementation (simplicity)”? This additional principle was added based on stakeholder feedback.  If not, are you supportive of the principles that are used in the development of the proposal?	
8. What are the unresolved questions or challenges you would want to see answered in this proposal?	
9. Additional comments	

**Table 7: Evaluation of Proposal: URICA**

Questions	Stakeholder Evaluation
1. Please rate your support of this proposal on a 1-10 basis, with 10 being completely supportive and 1 being not at all supportive. Please provide your rationale.	
2. Is the proposal an unbiased solution and evenly weighted in its analysis?	
3. Is the proposal feasible?	
4. Which stakeholders are best served by this proposal? Why?	
5. Which stakeholders are least served by this proposal? Why?	
6. Do the objectives/principles outlined in the proposal seem fair and reasonable?	
7. Does the proposal align with the consolidated principles (see Appendix A) presented in Technical Session 1 as well as the additional principle of “Ease of understanding and implementation (simplicity)”? This additional principle was added based on stakeholder feedback.  If not, are you supportive of the principles that are used in the development of the proposal?	
8. What are the unresolved questions or challenges you would want to see answered in this proposal?	
9. Additional comments	

## Appendix A

Principle	Description
<b>Overarching</b>	Tariff design and implementation facilitates a fair, efficient and openly competitive market (FEOC) <ul style="list-style-type: none"> <li>• Fosters competition and encourages new market entry</li> <li>• Efficiency</li> <li>• Avoidance of undue discrimination</li> <li>• Fairness</li> </ul>
<b>Principle 1</b>	Parity between transmission interconnection costs calculation for transmission connected customers and distribution connected customers while enabling effective price signals to ensure optimal use of existing distribution and transmission facilities <ul style="list-style-type: none"> <li>• Fairness</li> <li>• Effective price signals</li> </ul>
<b>Principle 2</b>	Market participants should be responsible for an appropriate share of the costs of transmission facilities that are required to provide them with access to the transmission system (may include paying a contribution towards facilities paid for by other customers and refund to the customer that paid) <ul style="list-style-type: none"> <li>• Fairness</li> <li>• Cost Causation</li> </ul>
<b>Principle 3</b>	DCG participants should have cost certainty when making their final investment decision (FID) <ul style="list-style-type: none"> <li>• Certainty of future costs</li> <li>• Stability</li> </ul>
<b>Principle 4</b>	DFOs should be provided with reasonable certainty re: cost treatment/recovery <ul style="list-style-type: none"> <li>• Certainty of future costs</li> <li>• Stability</li> </ul>
<b>Principle 5 (added)</b>	Ease of understanding and implementation <ul style="list-style-type: none"> <li>• Simplicity</li> <li>• Stability</li> </ul>