Stakeholder Comment Matrix - June 10, 2020

Participant-Related Costs for DFOs (Substation Fraction) and DFO Cost Flow-Through Technical Session 3



Period of Comment: June 10, 2020 through June 17, 2020

Comments From: Lionstooth Energy

Date: 2020/06/17

Contact: Phone:

Email:

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 tariffdesign@aeso.ca by June 17, 2020.

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

Questions	Stakeholder Comments
Please comment on the proposed agenda	Lionstooth Energy (Lionstooth) reiterates our comments from the Session 2B Comment Matrix (https://www.aeso.ca/assets/Uploads/Technical-Session-2B-LTE-Comments.pdf), that the following 3 important areas require immediate and further discussion:
	Interim Relief: Pursuing immediate interim relief ceasing the use of the substation fraction methodology and recalling the existing CCDs, with confirmation that interconnection costs for DCGs will be allocated at a single point in time and future unfettered risk will not feature in the permanent solution;
	 Understanding of Impacts: A common understanding of the impacts resulting from each proposal to various stakeholder groups must be completed prior to any proposals being filed with the AUC; and,
	 Multiple Proposals: Recognition that multiple proposals will be submitted by the AESO to the Commission, and equal time must be allocated to each proposal to engage with stakeholders on these concepts.



		We believe these 3 areas are significant and influential both for the remainder of the Technical Sessions as well as the subsequent AUC Proceedings. For this reason, we ask the AESO to address these 3 areas as part of Session 3 to establish alignment on the short-term path forward to return investor certainty.
2.	Please comment on the proposed process and session overviews as indicated in the Letter of Notice	Further to our comments above, we believe Session 3 should focus on the 3 important areas listed.
		Any additional time can be used to discuss any responses or follow up to the feedback from stakeholders on the other proponents proposals and the AESO's proposal.
		We feel that Session 4 is required. This session should be dedicated to presenting the impacts on the various stakeholder groups, inclduing DCGs, TCG. DFOs, and ratepayers, of the multiple proposals that will be submitted by the AESO to the AUC.
		We do not believe that any proposal, incremental plus or incremental only, can be submitted to the AUC without these impacts evaluated, discussed, and generally understood.
3.	Additional comments	

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