

## Stakeholder Comment Matrix – May 28, 2020

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



<p><b>Period of Comment:</b> May 28, 2020 through June 11, 2020</p> <p><b>Comments From:</b> Longspur Developments</p> <p><b>Date:</b> 2020/06/05</p>	<p><b>Contact:</b> [REDACTED]</p> <p><b>Phone:</b> [REDACTED]</p> <p><b>Email:</b> [REDACTED]</p>
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**Instructions:**

1. Please fill out the section above as indicated.
2. Please respond to the questions below and provide your specific comments.
3. **Please submit one completed evaluation per organization.**
4. Email your completed comment matrix to [tariffdesign@aeso.ca](mailto:tariffdesign@aeso.ca) by **June 11, 2020**.

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

	Questions	Stakeholder Comments
1.	<p>Please comment on the Technical Session 2B facilitated by the AESO on May 28, 2020. Was the session valuable? Was there something we could have done to make the session more helpful? Please advise and be as specific as possible.</p>	
2.	<p>The following five questions are seeking comments on the Technical Session 2B discussion regarding the outstanding design details identified on Slide 27.</p> <p>Please comment if (1) your organization does have or does not have agreement in principle and (2) any additional clarity or consideration to provide on the <b>following outstanding design details:</b></p> <ul style="list-style-type: none"> <li>• Substation fraction = 1 for DFOs</li> </ul>	

3.	<p>Please comment if (1) your organization does have or does not have agreement in principle and (2) any additional clarity or consideration to provide on the <b>following outstanding design details</b>:</p> <ul style="list-style-type: none"> <li>• Determining a \$/MW charge for DCG</li> </ul>	
4.	<p>Please comment if (1) your organization does have or does not have agreement in principle and (2) any additional clarity or consideration to provide on the <b>following outstanding design details</b>:</p> <ul style="list-style-type: none"> <li>• Determining the applicability of the DCG charge</li> </ul>	
5.	<p>Please comment if (1) your organization does have or does not have agreement in principle and (2) any additional clarity or consideration to provide on the <b>following outstanding design details</b>:</p> <ul style="list-style-type: none"> <li>• Determining the administration of the DCG charge</li> </ul>	
6.	<p>Please comment if (1) your organization does have or does not have agreement in principle and (2) any additional clarity or consideration to provide on the <b>following outstanding design details</b>:</p> <ul style="list-style-type: none"> <li>• Looking towards implementation</li> </ul>	
7.	<p>Additional comments</p>	<p>We do not agree that a contribution towards a share of existing facilities that are connected to the bulk and regional transmission system should be charged to DCGs, therefore we cannot comment on the above questions. DCGs bring co-locates generation with load, so will reduce the likelihood of additional wires costs for load customers, therefore should be encouraged to connect to the grid. Making them pay a contribution towards existing facilities that have already been approved and built will discourage DCGs, potentially increasing the likelihood of increased future wire costs for load customers, it doesn't make sense! We are not aware of this happening in other jurisdictions, so why do it in Alberta?</p> <p>It seems like in the short term there will not be a proposal that is clearly favoured, and</p>

		<p>that we are headed down the path of multiple proposals. Therefore we feel immediate and further discussion is required in specific areas of concern that should and can be addressed quickly, and so ease the pressure on achieving an expedited decision:</p> <ol style="list-style-type: none"> <li>1. <b>Interim Relief:</b> 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;</li> <li>2. <b>Understanding of Impacts:</b> 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,</li> <li>3. <b>Multiple Proposals:</b> 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.</li> </ol> <p>In particular, we would like to see Item 1 addressed and clarified by the AESO asap while the rest of the process is ongoing.</p>
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Thank you for your input. Please email your comments to: [tariffdesign@aeso.ca](mailto:tariffdesign@aeso.ca).