

## Stakeholder Comment Matrix – May 28, 2020

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



<b>Period of Comment:</b> May 28, 2020 through June 11, 2020 <b>Comments From:</b> Solar Krafte Utilities Inc. <b>Date:</b> 2020-06-11	<b>Contact:</b> [REDACTED] <b>Phone:</b> [REDACTED] <b>Email:</b> [REDACTED]
--	--

**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.	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><u>General Comment</u></p> <p>We are committed to parity between TCG and DCG. TCG does not pay shared costs (i.e., non-incremental costs) to connect to the AIES. Accordingly, DCG should not pay shared costs either to connect to the AIES.</p> <p>Alberta's disproportionately high, bloated, transmission costs are in part caused by an underrepresented DCG fleet in a province blessed with abundant, broadly distributed, natural gas and renewable energy resources ideal for competitive DCG. This costly transmission bloat caused by the structurally imposed under-representation of DCG impacts the competitiveness of Alberta businesses, farmers, and families. This is our</p>

		<p>chance to bring fairness, market-balance, and competitiveness into Alberta's grid. Instead, we appear to risk doubling down on past mistakes.</p> <p>Fundamentally, the issue is not one of policy but of jurisdiction. The mere fact the <i>Transmission Regulation</i> expressly allows the AESO to define "local interconnection costs" is not license for the AESO to trump its duties of fairness and non-discriminatory approach to access to the AIES. The AESO's misguided and counterproductive exercise of its discretion is the root of the problem and the reason we are having these proceedings. Having the AESO confine the conversation to these five "additional, exclusive to DCG, surtax" questions, ignoring the obvious underlying driver of fairness, diminishes the likelihood of an outcome that serves the public.</p> <p>TCG does not pay shared costs, DCG should not pay shared costs. Let the competitive market determine efficient interconnection paths, not the convoluted minutia of some exclusive to DCG AESO surtax.</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>	<p>We agree with substation fraction = 1 for DFOs</p>
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>	<p>We are fundamentally opposed to a shared costs approach. However, in the interests of a resolution, we are open to a "GUOC" equivalent for DCG, where 1) the \$/MW charge for this supplemental "GUOC" is equal to or less than the \$/MW charge for the current GUOC and 2) this supplemental "GUOC" is refundable over time based on performance.</p>
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>	<p>We are fundamentally opposed to a shared costs approach. However, in the interests of a resolution, we are open to a "GUOC" equivalent for DCG, where the applicability of the charge is geographically/ territorially driven using the same regional approach used for the current GUOC.</p>

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>	<p>Simplicity, feasibility and visibility are key. DCG needs to know this cost at the onset of its development, not at the Fortis quotation stage. Otherwise, we mire developments in uncertainty, and this serves no interests.</p>
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>	<p>We are supportive of an application for interim relief where substation fraction = 1 for DFOs.</p>
7.	<p>Additional comments</p>	

Thank you for your input. Please email your comments to: [tariffdesign@aeso.ca](mailto:tariffdesign@aeso.ca).