

Session 2 | Sept. 29, 2021 – Comments

Stakeholder Comments on Session 2 [Posted: Oct. 19, 2021]

1. ADC – Alberta Direct Consumers Association
2. AltaLink Management Ltd.
3. Capital Power Corporation
4. ENMAX Corporation
5. EPCOR Distribution and Transmission Inc.
6. Heartland Generation Ltd.
7. IPCAA – Industrial Power Consumers Association of Alberta
8. IPPSA – Independent Power Producers Society of Alberta
9. TransAlta Corporation

Stakeholder Comment Matrix – Sept. 29, 2021

2022 Budget Review Process (BRP) Stakeholder Engagement Session 2



Comment period:	Sept. 29, 2021 to Oct. 15, 2021	Contact:	Colette Chekerda
Comments from:	Alberta Direct Connect - ADC	Phone:	780-920-9399
Date:	2021-10-15	Email:	colette@carmal.ca

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 comment matrix per organization.**
4. **Stakeholder comment matrices will be published to aeso.ca, in their original state.**
5. Email your completed comment matrix to karen.campbell@aesoc.ca by **Oct. 15, 2021**.

The AESO values stakeholder feedback and invites all interested stakeholders to provide their comments on the 2022 BRP Stakeholder Engagement Session 2, the business initiatives and the 2022 preliminary forecasts and budgets presented. Please be as specific as possible with your responses. Thank you.

Questions		Stakeholder Comments
1.	Please comment on the 2022 BRP Session 2 hosted on Sept. 29, 2021. Was the session valuable? Was there something the AESO could have done to make the session more helpful?	The ADC found the session valuable and appreciates the opportunity to participate.
2.	Do you have any additional comments on the 2021 multi-year business initiatives and the proposed 2022 business initiative?	The Government is currently contemplating changes to the transmission regulation which will impact a number of AESO initiatives. The plan needs to have enough flexibility to consider any changes. Further, the ADC recommends the AESO examine affordability and industry competitiveness as a component of the business initiatives. The AESO should be knowledgeable on the impact electricity costs and tariff design have on jobs, growth, and the economy.
	(i) General Tariff Application	The AESO needs to provide a timely 2022 tariff update. Considering that the AltaLink rate relief expires, consumers will be looking at a material increase of over \$200M in 2022 based on the AESO forecast of wires costs.

Questions	Stakeholder Comments
(ii) Market Sustainability and Evolution	The AESO continues to talk about need for resource adequacy and flexibility, but has not set any priorities to work with flexible load so that they can continue to be a more effective grid resource. The preferred tariff will effectively put these loads at risk and potentially remove 400 MW of flexible load resources from the mix.
(iii) Settlement Audit	No comment
(iv) Red Tape Reduction	The ADC supports continued review of AESO Rules and reliability standards to eliminate any that don't have a direct and material impact to grid operations and reliability.
(v) Optimizing the Grid	The ADC supports efforts to optimize the grid, especially with the objective of utilizing existing assets as a priority and minimizing future transmission build.
(vi) Tariff Modernization	Transmission costs are the key concern of ADC members. Members sacrifice many hours of production to manage transmission costs by responding to high prices and the CPD. The AESO proposed tariff will force many members off the grid or out of the province. Decisions to halt capital expenditure in Alberta have already been made as result of the unsuccessful tariff mitigation process. Considering the other priorities, the ADC submits there must be a better tariff alternative for the high load factor and flexible loads. It's not too late for the AESO to pause, examine any changes to the transmission regulation and self-supply and export rules, and work with impacted loads to value their flexibility and keep their businesses contributing to the transmission revenue requirement.
(vii) Distribution Coordination	ADC supports this effort
(viii) Technology Integration	No comment
(ix) Proposed: Grid Resiliency	No comment
3. Do you have any comments on the 2022 Preliminary Forecasts and Budgets components?	Transmission costs are a key concern of ADC members. The AESO should be working with TFO's to reduce the existing revenue requirement. The AESO should provide transparency with respect to the utilization of transmission assets, in particular the CTI projects.
(i) Load Outlook	The ADC has suggested in the past that affordability of grid power will continue to impact DTS load growth. The current tariff design, while difficult on the industrial processes has at least kept high load factor and price responsive loads connected to the grid. The AESO should endeavor to study the impact on DTS load growth of their proposed tariff. This should include load that leaves the grid to self-supply, leaves the grid for more cost competitive provinces, or doesn't locate in Alberta due to affordability of electricity. The review should also include

Questions		Stakeholder Comments
		second order impacts on sectors which rely on energy intensive products such as compressed gasses, or pulping which takes the wood waste from numerous Alberta sawmills.
	(ii) Ancillary Services Costs	No comment.
	(iii) Transmission Line Losses Costs	The AESO claimed that the HVDC lines would contribute to reduced losses in the province. It would be beneficial for participants to understand the losses costs savings achieved from these assets.
	(iv) General and Administrative Budget	No comment.
	(v) Capital Budget	No comment.
4.	Additional comments	The ADC appreciates the opportunity to comment and looks forward to meeting with the AESO Board.

Thank you for you input. Please email your completed matrix to: karen.campbell@aeso.ca

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2022 Budget Review Process (BRP) Stakeholder Engagement Session 2



Comment period:	Sept. 29, 2021 to Oct. 15, 2021	Contact:	Richard Boulton/Rob Senko
Comments from:	AltaLink Management Ltd.	Phone:	403-850-5699/403-874-6762
Date:	2021/10/15	Email:	Richard.boulton@altalink.ca/rob.senko@altalink.ca

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Questions	Stakeholder Comments
1. Please comment on the 2022 BRP Session 2 hosted on Sept. 29, 2021. Was the session valuable? Was there something the AESO could have done to make the session more helpful?	The second session was valuable as it allowed stakeholders the opportunity to ask clarifying questions and/or provide further comments. AltaLink appreciated the opportunity to provide further comments and ask questions at the September 29 th session.
2. Do you have any additional comments on the 2021 multi-year business initiatives and the proposed 2022 business initiative?	
(i) General Tariff Application	No further comments.
(ii) Market Sustainability and Evolution	No further comments.
(iii) Settlement Audit	No further comments.

Questions	Stakeholder Comments
(iv) Red Tape Reduction	<p>AltaLink supports this business initiative with the following recommendation to be included within the business plan:</p> <p>AltaLink commends the AESO on its commitment to review the development and associated compliance monitoring for Alberta Reliability Standards (ARS) requirements. AltaLink believes there are numerous opportunities to reduce the burden on all market participants through a comprehensive review of the standard development process through to the monitoring and audit process that will maintain or improve the safe, reliable, and economic operation of the Alberta Interconnected Electric System. The timing is ideal for this review as the first Critical Infrastructure Protection and Protection and Control (CIP) Standards tri-annual audit cycle has closed. Moving forward where all market participants have a common understanding of requirements and expectations with enough advanced notice to obtain the necessary resources to comply will reduce the regulatory burden. The focus should be on reducing costs and regulatory burden while improving security and reliability.</p> <p>AltaLink also supports any other comments provided by stakeholders on this initiative that will assist in creating a path forward to address ARS compliance concerns.</p>
(v) Optimizing the Grid	No further comments.
(vi) Tariff Modernization	No further comments.
(vii) Distribution Coordination	No further comments.
(viii) Technology Integration	No further comments.
(ix) Proposed: Grid Resiliency	No further comments.
3. Do you have any comments on the 2022 Preliminary Forecasts and Budgets components?	
(i) Load Outlook	No further comments.
(ii) Ancillary Services Costs	No further comments.
(iii) Transmission Line Losses Costs	No further comments.

Questions		Stakeholder Comments
	(iv) General and Administrative Budget	No further comments.
	(v) Capital Budget	No further comments.
4.	Additional comments	No further comments.

Thank you for you input. Please email your completed matrix to: karen.campbell@aeso.ca

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2022 Budget Review Process (BRP) Stakeholder Engagement Session 2



Comment period:	Sept. 29, 2021 to Oct. 15, 2021	Contact:	Santi Churphongphun Matt Davis
Comments from:	Capital Power	Phone:	403-807-2909 403-540-6087
Date:	[2021/10/15]	Email:	schurphongphun@capitalpower.com mdavis@capitalpower.com

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Questions	Stakeholder Comments
1. Please comment on the 2022 BRP Session 2 hosted on Sept. 29, 2021. Was the session valuable? Was there something the AESO could have done to make the session more helpful?	Capital Power appreciates the AESO efforts in having its senior leadership available at the session to respond to stakeholder questions and encourages this practice to continue. The materials made available by the AESO to review ahead of the sessions were also helpful in preparing for and to facilitate more focused discussion about the AESO's planned initiatives, forecast and proposed 2022 budget. Going forward, Capital Power believes that less time in the session can be spent on the overview of the content of these materials and more time should be allocated on exploratory discussion (e.g., questions and answers).
2. Do you have any additional comments on the 2021 multi-year business initiatives and the proposed 2022 business initiative?	While the information provided in the materials ahead of time were useful in understanding the business initiatives themselves, clarity regarding their level of priority and AESO resource allocation for each (i.e., staffing, capital spend, etc.) could be improved. The materials provided to date indicate three levels of priority– i) Mandated; ii) Top Priority; and iii) Normal Course Initiatives. For example, the General Tariff Application and Red Tape

Questions	Stakeholder Comments
	<p>Reduction initiatives were identified as “Mandated” Top Priorities (Session 2 slides 17 & 21) suggesting these items take precedence over the remaining initiatives. The Market Sustainability/Evolution and Settlement Audit initiatives had neither the “Mandated” nor “Top Priority” labels (Session 2 slides 18 & 19) implying these were the lowest priority initiatives of the nine identified. The remaining initiatives were designated as “Top Priority” (Session 2 slides 22-26). The materials provided no additional information on the relative order of priority for the initiatives other than the aforementioned nomenclature used in the headings to describe each item. Going forward, the AESO’s view on this would be helpful to stakeholders in better understanding what initiatives are driving resource and budgetary needs.</p> <p>The AESO also did not provide any indication of the resources it expects to allocate to each initiative creating a disconnect with how AESO Own Costs were derived. Capital Power recommends that these details be provided in the BRP materials for stakeholders to review.</p>
(i) General Tariff Application	
(ii) Market Sustainability and Evolution	
(iii) Settlement Audit	
(iv) Red Tape Reduction	<p>In response to stakeholder comments, the AESO noted that it was open to exploring market participant concerns regarding regulatory burden in areas such as ARS compliance monitoring. Capital Power appreciates the AESO’s willingness to consider these concerns and reiterates its previous comments seeking the broadened usage of a risk-based approach to the AESO’s compliance monitoring & enforcement program. Capital Power also encourages the AESO to host an ARS specific stakeholder engagement in (or around) Q1 2022 where industry and the AESO can collaborate to enhance the existing ARS program including a review of the standards and, the self-certification and audit processes. To these ends, sessions should occur on a regular basis (e.g., biannually) and include the solicitation of stakeholder feedback and reports outlining the results of these discussions.</p>
(v) Optimizing the Grid	
(vi) Tariff Modernization	
(vii) Distribution Coordination	
(viii) Technology Integration	

Questions	Stakeholder Comments
(ix) Proposed: Grid Resiliency	<p>Capital Power supports this proposed initiative and submits that this should take priority over others such as Technology Integration which has the same “Top Priority” designation. Within the Grid Resiliency business initiative, five items were listed as issues the AESO would pursue as part of its plan to proceed. Unless the Most Severe Single Contingency (“MSSC”) is included in the scope of “frequency response capability,” Capital Power believes that it should be added as its own item and afforded the same high level of priority.</p> <p>The existing MSSC threshold was last broadly discussed in 2015 when the AESO issued an information document for stakeholder consideration. At that time, the AESO had recognized that there was a growing interest in connecting larger generators (some greater in size than the MSSC) but concluded that no changes were necessary. The AESO also noted that it “...has not placed any size restrictions on new generator proponents.”¹</p> <p>The AESO is now re-engaging stakeholders regarding MSSC with a session scheduled for early November 2021. Capital Power supports the review of MSSC given that the AESO recently decreased the MSSC threshold during islanded conditions in response to system events observed over the past year and to mitigate impacts from similar conditions going forward (ID #2011-001R). Though unclear how long such measures will be in place, Capital Power views that it is critical that it be temporary in nature while the AESO works to increase the system’s capabilities to manage under-frequency issues through improved frequency response. Capital Power appreciates the current reliability environment that the AESO faces, but also believes that the AESO must make reasonable efforts to provide system access on a non-discriminatory basis and work to facilitate (not encumber) competition and enhance (not reduce) the potential for efficiency gains. As such, Capital Power believes that the AESO should prioritize this issue due to its impact on reliability, the operations of existing and future supply resources, and the functioning of the wholesale market.</p>
3. Do you have any comments on the 2022 Preliminary Forecasts and Budgets components?	
(i) Load Outlook	

¹ Page 5, *Most Severe Single Contingency (MSSC) Impacts on Alberta Balancing Authority Area Operation - Observations and Information Sharing* (June 2015), AESO, <<https://www.aeso.ca/assets/Uploads/Most-Severe-Single-Contingency-MSSC-document-for-ARC-June2015.pdf>>

Questions		Stakeholder Comments
	(ii) Ancillary Services Costs	
	(iii) Transmission Line Losses Costs	
	(iv) General and Administrative Budget	As noted above, Capital Power recommends that the AESO provide stakeholders with details related to resources dedicated to each of the nine business initiatives so stakeholders can clearly see the importance and priority associated with them.
	(v) Capital Budget	
4.	Additional comments	Capital Power has no further comments at time.

Thank you for you input. Please email your completed matrix to: karen.campbell@aeso.ca

Stakeholder Comment Matrix – Sept. 29, 2021

2022 Budget Review Process (BRP) Stakeholder Engagement Session 2



Comment period:	Sept. 29, 2021 to Oct. 15, 2021	Contact:	Chris McCleave
Comments from:	ENMAX	Phone:	403-689-6341
Date:	2021-10-14	Email:	cmcleave@enmax.com

Instructions:

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Questions		Stakeholder Comments
1.	Please comment on the 2022 BRP Session 2 hosted on Sept. 29, 2021. Was the session valuable? Was there something the AESO could have done to make the session more helpful?	ENMAX would not only like to see more detail provided about how many internal AESO resources are allocated to each of the Business Initiatives (measured in FTE equivalents or person-hours), but also have them separated out by year so it is clear what is being allocated on an annual basis for each of the initiatives that span multiple years.
2.	Do you have any additional comments on the 2021 multi-year business initiatives and the proposed 2022 business initiative?	
	(i) General Tariff Application	No further comments at this time.
	(ii) Market Sustainability and Evolution	No further comments at this time.
	(iii) Settlement Audit	No further comments at this time.

Questions	Stakeholder Comments
(iv) Red Tape Reduction	<p>The AESO stated in Session #1 that they would be willing to share the quantitative methodology used to calculate their red tape reduction work to date. ENMAX would like to see this detail as well as a clear plan on how the AESO is planning to meet the remaining percentage of reductions in order to meet their goal. Is this information will not be shared broadly, please email cmccleave@enmax.com to discuss how we can obtain this information.</p> <p>In ENMAX's view, an important consideration is how a proposed change directly translates into cost savings not just for industry, but the AESO as well. As such, the cost benefits should be clearly outlined and provided through the Budget Review Process or similar forum.</p> <p>Currently, it remains unclear how the efficiencies being achieved through the Red Tape Reduction initiative correlate with AESO cost reductions.</p> <p>In addition to the comments above, ENMAX requests the AESO to host a Q1 2022 ARS specific stakeholder consultation session where industry can collaborate with the intent of enhancing the ARS program, including Standards, Self-Certification and Auditing. These sessions should take place twice a year and include a matrix for participants to document their suggestions, findings and feedback. This would help identify which areas could benefit from red tape reduction efforts. ENMAX has several ARS related topics already identified that it is prepared to discuss in more detail.</p>
(v) Optimizing the Grid	No further comments at this time.
(vi) Tariff Modernization	No further comments at this time.
(vii) Distribution Coordination	In addition to the previous comments submitted to the AESO, ENMAX reiterates that while the AESO appears to have numerous processes in which it engages with stakeholders on distribution, it would be extremely helpful if the AESO established a clear and consistent process on who and how they engage with stakeholders on this topic.
(viii) Technology Integration	In the AESO's response, it indicated that the AESO's first Technology Forward and Technology Summit in Q4 2021 is intended, among other things, to initiate dialogue on evolving

Questions	Stakeholder Comments
	<p>technologies including potential implications to the industry and more specially the AESO's mandate.</p> <p>We look forward to learning more about the opportunities and challenges that lie ahead as new technologies emerge, however, as noted by ENMAX in its previous comments to the AESO, mandate implications should not be assumed as this topic is within the purview of the Government of Alberta to consult and provide further direction on.</p>
(ix) Proposed: Grid Resiliency	No further comments at this time.
3. Do you have any comments on the 2022 Preliminary Forecasts and Budgets components?	<p>ENMAX asked a question in Session #2 about how this material is presented to the AESO Board and whether they provide benchmarks with other ISO's when engaging with the Board. While it was stated that the AESO had explored benchmarking in the past and decided that it would not do benchmarking, ENMAX would like to see this be a direct topic of conversation with the Board in 2021 and also be considered as a topic of engagement with stakeholders as well. There have been significant shifts in the electricity industry since benchmarking was last explored. While acknowledging the size of Alberta's system and its load profile has unique characteristics, there should be a way to characterize measurable metrics and be thoughtful while interpreting the information and comparisons.</p>
(i) Load Outlook	No further comments at this time.
(ii) Ancillary Services Costs	No further comments at this time.
(iii) Transmission Line Losses Costs	No further comments at this time.
(iv) General and Administrative Budget	No further comments at this time.
(v) Capital Budget	No further comments at this time.
4. Additional comments	None.

Thank you for your input. Please email your completed matrix to: karen.campbell@aeso.ca

Stakeholder Comment Matrix – Sept. 29, 2021

2022 Budget Review Process (BRP) Stakeholder Engagement Session 2



Comment period:	Sept. 29, 2021 to Oct. 15, 2021	Contact:	Saqib Chaudhary
Comments from:	EPCOR	Phone:	780-441-7109
Date:	2021/10/14	Email:	

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Questions		Stakeholder Comments
1.	Please comment on the 2022 BRP Session 2 hosted on Sept. 29, 2021. Was the session valuable? Was there something the AESO could have done to make the session more helpful?	Yes, the session was valuable.
2.	Do you have any additional comments on the 2021 multi-year business initiatives and the proposed 2022 business initiative?	See comments below re: Red Tape Reduction.
	(i) General Tariff Application	
	(ii) Market Sustainability and Evolution	
	(iii) Settlement Audit	

Questions	Stakeholder Comments
(iv) Red Tape Reduction	<p>EDTI views the current ARS programs in Alberta as an important component to maintaining a safe and reliable system and believes there are opportunities to streamline and enhance the current ARS program.</p> <p>EDTI believes there is value in bringing together the AESO, MSA and market participants to review Alberta's approach to Alberta Reliability Standard drafting, stakeholder consultation, implementation and compliance, to ensure that there is an appropriate balance of compliance efforts and costs while ensuring the secure and reliable operation of the bulk electric system.</p>
(v) Optimizing the Grid	
(vi) Tariff Modernization	
(vii) Distribution Coordination	
(viii) Technology Integration	
(ix) Proposed: Grid Resiliency	
3. Do you have any comments on the 2022 Preliminary Forecasts and Budgets components?	
(i) Load Outlook	
(ii) Ancillary Services Costs	
(iii) Transmission Line Losses Costs	
(iv) General and Administrative Budget	
(v) Capital Budget	
4. Additional comments	

Thank you for your input. Please email your completed matrix to: karen.campbell@aeso.ca

Stakeholder Comment Matrix – Sept. 29, 2021

2022 Budget Review Process (BRP) Stakeholder Engagement Session 2



Comment period:	Sept. 29, 2021 to Oct. 15, 2021	Contact:	Shanelle Sinclair
Comments from:	Heartland Generation Ltd.	Phone:	403-3697769
Date:	2021/10/15	Email:	Shanelle.sinclair@heartlandgeneration.com

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Questions	Stakeholder Comments
1. Please comment on the 2022 BRP Session 2 hosted on Sept. 29, 2021. Was the session valuable? Was there something the AESO could have done to make the session more helpful?	Yes, the session was useful. In the future, Heartland Generation suggests that the AESO indicate how many resources (staff and spend) it plans to put towards each initiative. This ranking information would put stakeholders in a better position to provide input on the AESO's BRP. The AESO should also provide a relative ranking for each of the initiatives presented.
2. Do you have any additional comments on the 2021 multi-year business initiatives and the proposed 2022 business initiative?	
(i) General Tariff Application	
(ii) Market Sustainability and Evolution	While we appreciate that the projects contemplated for the markets division are classified as 'narrow in scope', it is not clear that are the initiatives should be pursued given other priorities.

Questions	Stakeholder Comments
	For example, Heartland reiterates that it is unclear why an OR market review is needed at this time. Simply put, what significant issues warrant an investigation and how does the AESO define what it means by making the OR market 'more competitive'?
(iii) Settlement Audit	
(iv) Red Tape Reduction	Heartland Generation appreciates that Red Tape Reduction is government mandated. However, some of the objectives such as looking at line losses appear to use man-hours that may not be warranted at this time given the AESO's other priorities.
(v) Optimizing the Grid	
(vi) Tariff Modernization	
(vii) Distribution Coordination	
(viii) Technology Integration	Heartland Generation reiterates our previous comments that the AESO should consider its treatment of any new technology through the lens of FEOC.
(ix) Proposed: Grid Resiliency	
3. Do you have any comments on the 2022 Preliminary Forecasts and Budgets components?	
(i) Load Outlook	
(ii) Ancillary Services Costs	The costs information was useful.
(iii) Transmission Line Losses Costs	
(iv) General and Administrative Budget	Generally, the trend of the AESO increasing its own costs is concerning. We believe that the AESO's growth is out of step with other governmental agencies and the economic realities that the Province has faced since COVID-19. We appreciate the thoughtful and forthcoming information provided and appreciate that hiring in some areas of the AESO is required. However, to keep costs in check, less important initiatives should be abandoned to free up

Questions	Stakeholder Comments
	additional resources. Stakeholders should be consulted on which initiatives should move forward in a given year.
(v) Capital Budget	
4. Additional comments	Heartland Generation appreciates the AESO's efforts to restore its trading charge to historic levels. However, given that the decrease is in part from over-collection, Heartland Generation is concerned that this level of trading charge will not be maintained in the future. Every effort should be made to ensure that the trading charge does not increase.

Thank you for your input. Please email your completed matrix to: karen.campbell@aeso.ca

Stakeholder Comment Matrix – Sept. 29, 2021

2022 Budget Review Process (BRP) Stakeholder Engagement Session 2



Comment period:	Sept. 29, 2021 to Oct. 15, 2021	Contact:	Vittoria Bellissimo
Comments from:	Industrial Power Consumers Association of Alberta (IPCAA)	Phone:	403 966 2700
Date:	2021/10/15	Email:	Vittoria.Bellissimo@IPCAA.ca

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1. Please comment on the 2022 BRP Session 2 hosted on Sept. 29, 2021. Was the session valuable? Was there something the AESO could have done to make the session more helpful?	<p>The session was valuable. IPCAA appreciates the AESO executive team attending and presenting on their respective areas.</p> <p>Obviously, this would be easier in person than on MS Teams. In terms of online platforms, AESO sessions are easier to participate in on Zoom.</p> <p>As stated in previous BRP stakeholder engagements, IPCAA submits that Cost Management should be a stand-alone priority item. The AESO should be allocating additional resources to managing wires costs in Alberta, including both transmission and distribution costs. This should be a high enough priority to have its own critical business initiative and an AESO VP dedicated to achieving cost reductions.</p>
2. Do you have any additional comments on the 2021 multi-year business initiatives	The AESO has a full plate of initiatives in listed here, without fully contemplating possible Transmission Regulation changes that could require additional efforts.

Questions	Stakeholder Comments
and the proposed 2022 business initiative?	See previous comments on lack of prioritization on Cost Management.
(i) General Tariff Application	
(ii) Market Sustainability and Evolution	The AESO states: “ <i>Following updated analysis based on 2021 LTO and scenarios (long-term adequacy, revenue sufficiency, system flexibility assessment, etc.), identify any other required market initiatives to support long-term sustainability and competitiveness of the energy-only market, with a long-term view of potential market changes within the existing structure needed to facilitate continued resource adequacy and increased flexibility.</i> ” Does this include re-examining the price floor in light of the high penetration of renewable projects that is expected?
(iii) Settlement Audit	IPCAA continues to support a complete, independent, end-to-end settlement audit and welcomes the AESO’s commitment to such an audit. IPCAA is disappointed that prior to undertaking the audit, the AESO did not request stakeholder input on the Terms of Reference. In addition, ISOs in other jurisdictions do not require stakeholders to sign NDAs to see the audit reports. Can the AESO come up with a way of making the report public, while satisfying confidentiality concerns? Perhaps look to other jurisdictions for guidance.
(iv) Red Tape Reduction	While IPCAA would agree that Red Tape Reduction is important, we emphasize that it should not simply be undertaken as a method to reduce transparency. Under “How we plan to proceed” the AESO states: “ <i>The AESO is open to exploring other areas where market participants have concerns about regulatory burden, such as loss factors and ARS compliance monitoring.</i> ” With respect, being “open to exploring areas” is not a concrete plan for proceeding. IPCAA members have expressed concerns with regard to ARS compliance monitoring and would appreciate more of a process for addressing these than the AESO being open to a discussion.
(v) Optimizing the Grid	IPCAA submits that the AESO should publish a comprehensive and consistently updated map detailing connection options and transmission capacity available. This will enable better, more transparent decision-making, particularly for renewables. Does the AESO’s current “Transmission Capability Mapping” satisfy stakeholders, particularly renewable energy developers? This is vital to prioritizing the utilization of the existing transmission system.
(vi) Tariff Modernization	As stated on many occasions, IPCAA would prefer not to have two major tariff overhauls in short order. We need to provide consumers with clarity and certainty. IPCAA is very concerned

Questions	Stakeholder Comments
	<p>that the AESO’s plan to “modernize” the tariff prior to possible implementation of T-Reg changes will result in multiple tariff “modernizations”.</p> <p>With regard to possible government T-Reg changes, the AESO states: “<i>Should Transmission Regulation changes result from the current government engagement, [the AESO will] assess and initiate changes to the ISO tariff required to implement.</i>” There is always an option to leave the tariff as is until the results of the DOE consultation are known.</p> <p>In addition to possible T-Reg changes, there are other potential changes that will also impact the tariff including: government policy with regard to self-supply and export; and ensuring alignment between transmission-level (ISO Tariff) and distribution rates, which is currently being discussed by the AUC. We will likely never have 100% policy certainty; however, we currently have major issues under discussion. It is prudent to leave the tariff as is until these key items are settled.</p>
(vii) Distribution Coordination	<p>IPCAA supports efforts will ultimately reduce the overall distribution and transmission costs. IPCAA is concerned that distribution utilities are not incented to participate in these efforts.</p> <p>IPCAA supports the “<i>focus on probabilistic planning, connection process improvements, and exploring how distributed resources may assist in optimizing the grid.</i>”</p>
(viii) Technology Integration	<p>It would be useful to understand how the AESO is coordinating with other entities in the Alberta innovation eco-system. These entities should be invited to participate in the “Technology Summit” and provide input going forward.</p> <p>As stated previously over the past decade, IPCAA supports the AESO and TFOs undertaking Dynamic Line Ratings on the transmission lines connected to wind generation, in order to maximize the transmission lines’ capability.</p>
(ix) Proposed: Grid Resiliency	
3. Do you have any comments on the 2022 Preliminary Forecasts and Budgets components?	<p>Transmission Wires Costs are not included in this list, unlike previous years. IPCAA members are very concerned with the current level of wires costs in Alberta – see comments above regarding Cost Management as a priority item. The AESO should work with the TFOs to make every effort to reduce the existing revenue requirement. In addition, the AESO should publish the utilization of transmission lines, and the CTI projects in particular. These should be compared with what was expected when then projects were proposed. Key differences should be explained to consumers.</p>

Questions	Stakeholder Comments
	Recent announcements regarding the retirements of KH1 and SD4 will clearly impact pool price forecasts. Does the AESO feel the impact is sufficient that the pool price forecast should be updated instead of using a forecast published on August 16 th ?
(i) Load Outlook	<p>The AESO continues to focus on AIL and points out load growth. IPCAA reminds the AESO that it is the DTS load that pays the vast majority of electricity costs. The forecasted 2022 DTS load has yet to reach 2018 levels. The AESO has indicated that they no longer forecast DTS peak demand, which is confusing because it is an input used to forecast rates.</p> <p>The AESO should focus on DTS (primary) demand, as other jurisdictions do.</p>
(ii) Ancillary Services Costs	See comments on pool price above.
(iii) Transmission Line Losses Costs	See comments on pool price above.
(iv) General and Administrative Budget	As we will present to the AESO Board again this year, the Alberta ISO continues to be one of the most expensive ISOs in North America.
(v) Capital Budget	
4. Additional comments	Thank you for the opportunity to provide input into this process.

Thank you for your input. Please email your completed matrix to: karen.campbell@aeso.ca

Stakeholder Comment Matrix – Sept. 29, 2021

2022 Budget Review Process (BRP) Stakeholder Engagement Session 2



Comment period:	Sept. 29, 2021 to Oct. 15, 2021	Contact:	Evan Bahry
Comments from:	IPPSA	Phone:	403-669-8664
Date:	2021/10/15	Email:	Evan.Bahry@IPPSA.com

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 comment matrix per organization.**
4. **Stakeholder comment matrices will be published to aeso.ca, in their original state.**
5. Email your completed comment matrix to karen.campbell@aeso.ca by **Oct. 15, 2021**.

The AESO values stakeholder feedback and invites all interested stakeholders to provide their comments on the 2022 BRP Stakeholder Engagement Session 2, the business initiatives and the 2022 preliminary forecasts and budgets presented. Please be as specific as possible with your responses. Thank you.

Questions	Stakeholder Comments
<p>1. Please comment on the 2022 BRP Session 2 hosted on Sept. 29, 2021. Was the session valuable? Was there something the AESO could have done to make the session more helpful?</p>	<p>Yes, the session was useful. In the future, we would suggest that the AESO provide a breakdown of its Own Costs per Business Initiative. This would help stakeholders appreciate the AESO's relative ranking of these Initiatives. That ranking would better inform stakeholders' input into the AESO's BRP and help stakeholders to align their own resources to engage with the AESO in pursuing common goals in the year ahead.</p> <p>Where possible, we'd also ask that the AESO create succinct 'problem statements' to help stakeholders understand what it's initiatives are intended to resolve. These would be one or two sentences that state the problem and - ideally - whose progress can be measured. We'd imagine that the AESO intuitively knows what the problem statements are (give that its initiatives have made it to the plan and that some have resources and budgets attached). So the request is to convey those concerns succinctly. E.G. What problem is the Mothball rule/OR review/Settlement Audit/Distribution Coordination intended to resolve? Stakeholders could use the BRP process to comment on the problem statements. This would help the AESO and its stakeholders get on the same page and collaboratively define the issues we want to work towards.</p>

	Questions	Stakeholder Comments
2.	Do you have any additional comments on the 2021 multi-year business initiatives and the proposed 2022 business initiative?	The AESO's Own Costs are increasing. However, the BRP material does not connect the AESO's Own Costs to the nine Business Initiative that are driving these costs. In the future, we recommend that the AESO provide a breakdown of its Own Costs per Business Initiative.
	(i) General Tariff Application	
	(ii) Market Sustainability and Evolution	<p>Of the AESO's 2022 work, we think the AESO's market monitoring studies - with a focus on flexibility and revenue sufficiency - will be of acute interest to industry given the dramatic changes expected in Alberta's dispatchable supply and intermittent supply over the near-term. The nature of Alberta's power supply will be impacted by future carbon prices that are intended to rapidly accelerate decarbonization. Stakeholders will want to be involved in these studies every step of the way given how they may inform the market's future.</p> <p>We appreciate Ms. Keating Erickson's comments during the latest BRP webinar that the other items contemplated for the market's area were really 'narrow in scope'. This commitment recognizes industry's need for policy stability and recognizes the need for the AESO to prioritize other matters. (e.g. response to T-reg changes, Grid Optimization). We also appreciate the AESO's commitment that it will not proceed with change without consultation.</p> <p>Additionally, we do appreciate Ms. Keating Erickson's comments that the focus on the OR review will be on removing barriers to entry. We look forward to working with the AESO on the scope of that review and to define terms such as 'improving competition.' The OR review should proceed with a clear – and narrow - objective in mind.</p> <p>As noted in our response to question 1, above, some of the market initiatives may benefit with a clear problem statement, defining what the initiative is intended to resolve.</p>
	(iii) Settlement Audit	
	(iv) Red Tape Reduction	With regard to reliability standards, IPPSA recommends that the AESO adopt a 'risk-based' approach to compliance monitoring and enforcement. This would see the AESO focus its resources in proportion to the standard's impact on system reliability.

Questions	Stakeholder Comments
(v) Optimizing the Grid	<p>Within this Initiative, we recommend that the AESO prioritize non-wires solutions such as the provision of connection maps, probabilistic planning, and dynamic line ratings as it seeks to optimize the grid. These are all very good ideas.</p> <p>We reiterate our previous comments that the AESO’s solutions to grid optimization need to avoid disrupting the wholesale market. The greatest risk for disruption comes with any decision by the AESO to contract/dispatch a non-wires asset (e.g. supply, demand response, storage). As such, the ideas to optimize the grid noted above should be explored and exhausted first.</p>
(vi) Tariff Modernization	<p>We recommend that the AESO prioritize Demand Opportunity Service modernization as a key step in the removal of barriers to energy storage.</p> <p>We also caution that should the forthcoming transmission regulation include significant changes, the AESO may need to reshuffle a number of its 2022 priorities. As the AESO is aware, that regulation contains incredibly complex matters including losses, unconstrained transmission planning, congestion management, GUOC, non-wires alternatives, among others. Changes to any of these matters would require significant and broad consultations with stakeholders.</p>
(vii) Distribution Coordination	
(viii) Technology Integration	<p>Within this Initiative, we recommend that the AESO prioritize DOS methodology as a means to remove a barrier to entry for technologies like storage.</p> <p>With regard to integrating any new supply or demand technologies, we reiterate our previous comments that the AESO should focus on removing barriers to entry and should not favour any one technology over another, or one competitor over another. To the point, DER and grid connected generation should compete on a level playing field against each other. Demand response technology and supply technology should also compete on a level playing field against each other.</p>

Questions	Stakeholder Comments
(ix) Proposed: Grid Resiliency	<p>We appreciate that the AESO has delineated the priorities it will pursue within this Business Initiative. That adds important clarity for stakeholders.</p> <p>We note that this is a 'proposed' initiative. Can the AESO confirm whether its Own Costs budget includes the staff and capital cost investments required to implement this initiative? Or will the AESO's Own Costs be adjusted after its approved?</p>
3. Do you have any comments on the 2022 Preliminary Forecasts and Budgets components?	
(i) Load Outlook	
(ii) Ancillary Services Costs	<p>Related to the AESO's OR market review, we'd ask that the AESO define what it means by making the OR market 'more competitive.' We assume the AESO does not have a cost target in mind. Please confirm. (To the point, when reviewing recent history, AS costs appear to reflect a normal range and/or market fundamentals.) As noted before, the OR market initiative may benefit with a clear problem statement.</p>
(iii) Transmission Line Losses Costs	
(iv) General and Administrative Budget	<p>As mentioned before, we would recommend that the AESO provide a breakdown of its Own Costs per Business Initiative. This would help stakeholders appreciate the AESO's relative ranking of these Initiatives. That ranking would better inform stakeholders' input into the AESO's BRP and help stakeholders align their own resources to engage with the AESO in pursuing common goals in the year ahead.</p>
(v) Capital Budget	
4. Additional comments	<p>We appreciate that the trading charge has shrunk to more normal levels and we reiterate our request that the AESO keep its costs down and its priorities tightly focused.</p> <p>Thank you for the opportunity to participate in this process.</p>

Thank you for you input. Please email your completed matrix to: karen.campbell@aeso.ca

Stakeholder Comment Matrix – Sept. 29, 2021

2022 Budget Review Process (BRP) Stakeholder Engagement Session 2



Comment period:	Sept. 29, 2021 to Oct. 15, 2021	Contact:	Luis Pando
Comments from:	TransAlta Corporation	Phone:	403-267-3627
Date:	2021/10/15	Email:	Luis_Pando@transalta.com

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 comment matrix per organization.**
4. **Stakeholder comment matrices will be published to aeso.ca, in their original state.**
5. Email your completed comment matrix to karen.campbell@aeso.ca by **Oct. 15, 2021**.

The AESO values stakeholder feedback and invites all interested stakeholders to provide their comments on the 2022 BRP Stakeholder Engagement Session 2, the business initiatives and the 2022 preliminary forecasts and budgets presented. Please be as specific as possible with your responses. Thank you.

Questions	Stakeholder Comments
1. Please comment on the 2022 BRP Session 2 hosted on Sept. 29, 2021. Was the session valuable? Was there something the AESO could have done to make the session more helpful?	<i>The AESO should provide budgeted resourcing and costs associated with each initiative</i> The session was valuable as it provided clarity about the scope and prioritization of the proposed business initiatives. In the next stage of this work, the AESO should provide more detailed information regarding the interdependencies between initiatives, as well as identification of the multi-year plans, for the initiatives highlighted in the presentation. More specifically, the Market Sustainability and Evolution, Optimizing the Grid, Tariff Modernization, Technology Integration and Grid Resiliency initiatives. The AESO should also provide more information regarding the cost and resourcing for each initiative. Stakeholders require transparent information to understand and assess how the proposed activities will drive the AESO's resource needs and associated costs so that we can meaningfully comment on the prioritization of those activities to maximize efficiency and value.
2. Do you have any additional comments on the 2021 multi-year business initiatives and the proposed 2022 business initiative?	

Questions	Stakeholder Comments
(i) General Tariff Application	No additional comments.
(ii) Market Sustainability and Evolution	<p><i>New technology and future reliability requirements should be the focus of market sustainability and evolution</i></p> <p>TransAlta recommends that the AESO focus its efforts on identifying and planning for the reliability needs associated with high renewable penetration that we expect in Alberta. The AESO should approach this issue by identifying the reliability needs and exploring the right market-based approaches to meet those needs. TransAlta supports the initiatives that continue the development of market rules that contemplate new technology and more specifically energy storage.</p> <p>TransAlta disagrees that the operating reserves initiative, which is currently scoped to pursue changes to enable Distributed Energy Resources (DER) resources participation, should be pursued at all. We raised several significant concerns in our October 30, 2020 and March 17, 2021 submissions made in the consultation on DER Market Participation Options that remain unaddressed (and appear to have been ignored in the prioritization reflected in this BRP), including asymmetrical obligations (must offer) for large and small providers, the lack of any details of practices or system changes that will ensure that small and large provider are directed to provide operating reserves in the same manner and the lack of cost information that demonstrates that individual DER participation is cheaper than an aggregation approach. TransAlta recommends that the focus of any operating reserves initiative be tied back to the planning for future reliability needs. This is the model being used in most markets that are facing similar issues with system inertia that Alberta has experienced recently and we expect it will become a bigger concern as the supply mix rapidly changes.</p>
(iii) Settlement Audit	No additional comments.
(iv) Red Tape Reduction	<p><i>Red Tape Reduction should translate into reduced costs and increased efficiency for both the AESO and market participants and the BRP should clearly specify these savings</i></p> <p>TransAlta appreciates the AESO's decision to include a potential review of the loss factors calculation process and the ARS compliance monitoring if the focus is truly on rationalizing the regulatory requirements to reduce the regulatory burden on market participants, rather than just relieve the AESO of regulatory requirements.</p> <p>To the extent that the red tape reductions are related to AESO requirements, we would like to be provided with more transparency into how those reduced requirements translate into cost reductions and efficiencies for the AESO. Our expectation is that reductions that are pursued under this initiative will not contribute to more AESO costs, require additional AESO resources</p>

Questions	Stakeholder Comments
	<p>to realize the red tape reduction initiative or push requirements from the AESO to the market participants (leading to greater burden).</p> <p>Additionally, TransAlta would like to understand how the ~ \$350,000 in estimated savings mentioned in the AESO presentation (slide 21), as well as other savings in hiring external resources, are reflected in the budget.</p>
<p>(v) Optimizing the Grid</p>	<p><i>Transmission capability mapping, dynamic line ratings and developing a framework for non-wires alternatives should be key priorities</i></p> <p>TransAlta looks forward to the release in Q4 of 2021 of the methodology and approach to transmission capability mapping and welcomes the additional information regarding the scope and timelines.</p> <p>TransAlta supports the launch of a cross functional team to develop a business case to assess possible implementation of dynamic line ratings in Alberta.</p> <p>TransAlta also supports the AESO's proposed development of an enhanced framework for consideration of non-wires alternatives. However, it will be important for the AESO to share specific details on this initiative and the assessed prioritization to allow market participants the opportunity to provide comments and feedback.</p>
<p>(vi) Tariff Modernization</p>	<p><i>The AESO should address questions and concerns about bulk and regional tariff design in the stakeholder process rather than in the regulatory proceeding to reduce costs</i></p> <p>To improve regulatory efficiency and reduce the high costs of contested regulatory proceeding, we recommend that the AESO refocus its efforts on addressing all questions and outstanding issues raised thus far in the stakeholder sessions, including the information requests posted by staff of the Alberta Utilities Commission. TransAlta discourages the AESO from taking the approach of using the regulatory proceeding as the first place that it attempts to respond to these issues because it will result in a prolonged proceeding that ultimately drives AESO and market participant costs higher.</p> <p>With respect to the proposed bulk and regional tariff, TransAlta also asks the AESO to consider the negative impacts of its preferred rate design on exporters and present mitigation proposals accordingly. TransAlta notes that the AESO only appears to be considering applying rate shock mitigation to demand transmission service customers, which is unfair and unequitable to export customers that will be impacted by rates that will double under the AESO's proposal.</p> <p>TransAlta also recommends that the AESO review its approach to with respect to DOS and contemplate creating an interruptible rate in order to truly modernize its tariff.</p>

Questions	Stakeholder Comments
(vii) Distribution Coordination	<p>Ensuring consistency in planning, coordinating information, applying the same standards on distribution connected generation should be key priorities</p> <p>TransAlta supports better coordination between DFOs, TFOs and the AESO, particularly the coordination of hosting capacity mapping with the AESO's transmission capability mapping. TransAlta also supports the work the AESO is doing to ensure that distribution connected generators meet the same requirements as transmission connected generators under the generation standards. This is not only needed to ensure reliability but also to maintain a level playing field.</p>
(viii) Technology Integration	<p>TransAlta looks forward to the Technology Forward Report and the summit the AESO plans to host in Q4 2021. The pace of new technology integration is increasing and the need for this forum has increased. TransAlta recommends that the focus should be on contemplating new technology integration and updating the market rules to provide clarity on how these technologies can participate in the market.</p>
(ix) Proposed: Grid Resiliency	<p>Planning for future reliability and resiliency needs is a critical, top priority initiative</p> <p>TransAlta agrees that this is a top priority initiative and supports its prioritization over all other initiatives. This is a new initiative and should be pursued by the AESO with a clear problem statement, scope, deliverables and timing. More specifically, the AESO has listed a large number of different sub-initiatives under this category that it intends to focus on in 2022. The list is quite broad in scope and there is a concern that it can become unwieldy and lead to poor execution unless it is well planned. TransAlta suggests that a roadmap may be appropriate as this appears to be multi-year initiative and a roadmap clearly identify how the sub-initiatives are planned to be staged and progressed in an efficient, coordinated and effective manner.</p>
3. Do you have any comments on the 2022 Preliminary Forecasts and Budgets components?	
(i) Load Outlook	No additional comments.
(ii) Ancillary Services Costs	No additional comments.
(iii) Transmission Line Losses Costs	No additional comments.
(iv) General and Administrative Budget	<p>More detail is needed about the proposed increase in G&A costs</p> <p>TransAlta would like to better understand the reasons behind the proposed increase of General and Administrative (G&A) costs.</p>

Questions	Stakeholder Comments
	<ul style="list-style-type: none"> The AESO proposed G&A costs for 2022 are \$4.0 million (4%) higher than budgeted 2021 costs. The AESO stated that this is due to increases in facility operating costs and insurance costs, and staff resources required to advance strategic initiatives. The AESO should specify the drivers of these costs and explain whether these cost increases are forming an increasing cost trend. The AESO also stated that forecasted G&A costs for 2021 are higher than budgeted expectations due to lower vacancy rates than historical as well as the impacts of COVID-19 on the timing and completion of work and administrative costs given a remote work environment. The AESO should provide the head count increase that occurred associated with this higher-than-budget expectation. <p>TransAlta would like to better understand these trends because our expectation is that factors that may have driven costs higher in 2021 should not prevail in 2022. TransAlta expected to see a decrease in G&A costs relative to 2021 costs rather than the increase that has been proposed by the AESO.</p> <p>Additionally, TransAlta does not see the need for more staff to advance the AESO's proposed initiatives. TransAlta asks the AESO for more transparency and details about the staff assigned so that stakeholders can better understand how each initiative drives resource needs. Identifying interdependencies between business initiatives could create efficiencies such as using the same staff and resources for similar or related activities. It also assists in identifying opportunities to adjust priorities and staging work to eliminate the need for more staff.</p>
(v) Capital Budget	No additional comments.
4. Additional comments	<p><i>The timing and priority of initiatives should be coordinated with the timing of potential changes in legislation and/or regulation</i></p> <p>As the AESO is aware, the Government may be proposing legislative and regulatory changes that could impact several of these initiatives. For example, the Government may propose changes to the prescribed line loss methodology in the <i>Transmission Regulation</i> and that could impact the current approach to calculating line losses. These considerations should be taken into account in the timing and prioritization of the AESO's work.</p>

Thank you for your input. Please email your completed matrix to: karen.campbell@aeso.ca