

Hi Nicole,

We have reviewed the draft time-varying rates report and have the following comments:

1. Minor comments relating to paragraph 19 and Figure 2:
  - a. The data shown is from 2021, while the AUC website includes data up to the end of 2023. It is unclear why older data is used when more recent information is available.
  - b. We also looked at the data and it appears this reflects retail load only, excluding transmission-connected and behind-the-fence loads. This makes sense for the analysis, since only retail load would be impacted by time-of-use rates. However, the wording currently makes it sound like this represents the total load of the province, which isn't accurate. A slight change in wording could help clarify this. Even the industrial load mentioned here refers to industrial retail load. For example, it would exclude larger industrial loads such as oil sands, newsprint, etc.
2. For paragraphs 27,28 and 42: We suggest adding the caveat that analysis may not incorporate other savings/changes due to the REM or OTP implementation impact to energy and wires costs. In that vein, the AUC is advised to use % changes in addition to \$ estimates to better draw attention to relative savings in addition to levels.
3. In paragraph 56: Stakeholders that completed the AESO's cost survey in August/September 2024 provided cost estimates.
4. Paragraph 57: It would be worthwhile elaborating why an hourly meter at the distribution level can still be compatible and separate from the decision to move to 5-minute meters at the transmission level.
5. Paragraph 69: It may be beneficial to highlight other potential activities that could be pursued under the centralized model (i.e., Do Texas or Ontario also support further optimization research activities? Manage other programs such as demand response during emergency events?)
6. Overall, we do not have concerns with the draft with respect to impacts on transmission, the AESO, and the ISO Tariff. In particular, we do not have any concerns with footnote 21 that caveats that extending this to transmission scope is a later issue.

Feel free to reach out if you would like to discuss or need more information from us.

Thanks,

Grace Wong