

Stakeholder Feedback: Large Load Integration Phase 2A

Comment Period: June 26 – July 13, 2026

We value stakeholder input and invite stakeholders to provide their feedback on the materials presented on Large Load Integration Phase 2A: Bring Your Own Generation (BYOG) Process via the following stakeholder feedback form **by July 13, at 4:00 p.m. MT**. Please be as specific as possible with your responses. Thank you for your input.

Purpose

Following our session on June 24, we are inviting written comments from stakeholders that will inform the final design of the BYOG Process, targeted to be rolled out in August 2026.

When providing feedback, stakeholders are encouraged to be constructive and provide alternatives and solutions to the parts of the process that they disagree with. Please note that the feedback is limited to the AESO's proposal, as presented, and [Proposed BYOG Process](#) posted with this feedback form.

Instructions

1. This feedback form is open to all industry stakeholders.
2. Please fill out the sections below as indicated.
3. Only one completed feedback form will be accepted per organization.
4. To upload your completed feedback form:
 - You will need to be registered and signed in on the AESO Engage platform; and
 - You will need to be on the PROJECT page (link to AESO Engage), which can be found on the AESO website at www.aeso.ca and follow the path: AESO Engage (found on very top navigation bar) > Hub > Project; and
 - Click on the "Submit Stakeholder Feedback" box below to upload your completed feedback form.

All responses are **due by July 13, 2026, at 4:00 p.m. MT**. and will be shared on AESO Engage in their original format. If you have any questions, please email stakeholder.relations@aesoc.ca

Comments From (Organization): Business Renewables Centre-Canada

Respondent Name (First and Last): Jorden Dye

Respondent Title: Director

Load Applicability and Generator Qualifications

1. Do you agree with the type and size of loads that the BYOG process will apply to? If not, please explain what loads you feel the BYOG process should or shouldn't apply to, and why.

No comment.

2. Do you agree with the generation types that qualify for BYOG? If not, please explain what other generation or other supply types you feel the BYOG process should apply to, and how those generation or supply types would meet the goals of BYOG.

Business Renewables Centre-Canada (BRC-Canada) is encouraged that the Government of Alberta and the AESO are planning for large load integration. BRC-Canada sees the opportunity for a world leading strategy through the BYOG process by amending it to provide greater flexibility, attract more investment to Alberta, and support investment in the electricity system. As drafted, the current approach will restrict data centre developers' ability to pursue lower-cost supply options.

BRC-Canada is unclear about the resource adequacy criteria the AESO used to develop the draft BYOG process. While it is prudent to manage load growth with new supply and to require real-time matching, as the "anti-islanding" test implies, BRC-Canada recommends that the AESO use a technology-agnostic, performance standard-based approach to determine which types of generation should qualify for a specific BYOG application. Further, this standard and the criteria used to measure it should be publicly available.

For example, rather than excluding certain technologies at the outset, the AESO should allow developers to demonstrate that a hybrid wind or solar and energy storage facility can meet defined performance standards. As the AESO's primary concern is grid resource adequacy, new data centre load should also be allowed to be tethered to multiple new generation projects, such as a wind facility, solar facility, and storage facility.

The anti-islanding test is also unclear as peak data centre load is likely to coincide with the most severe heat-related thermal derates on hot summer days. Because resource adequacy is a capacity issue, not solely an energy issue, the AESO should consider capacity accreditation approaches used in other jurisdictions that recognize both the contribution of non-thermal resources and the limitations of thermal generation. For example:

1. In PJM, the Effective Load Carrying Capability (ELCC) ratings for 10-hour energy storage and demand response rank as equivalent to, or higher than, any gas asset leading to 2030 and remain comparable after 2030,¹
2. ERCOT has completed its first ELCC study and is now applying a similar approach to PJM, finding that 5-hour storage in summer 2025, a worst-case period, still carries a 68% ELCC,²
3. MISO publishes seasonal wind and solar capacity credit ratings that recognize that, despite variability, these resources contribute to grid resource adequacy,
4. Ireland's energy regulator (CRU) requires new data centres to meet 80% of their annual demand with new renewable energy generation to be built within Ireland, on-site or near the project, within six years,³ and
5. Ontario's most recent capacity procurement was fully rewarded to battery storage facilities (640 MW), beating submissions from gas, bioenergy, and combined heat and power facilities overall.⁴

BRC-Canada recognizes the physical and market differences between Alberta and these other jurisdictions, as well as the rapid policy and market demands that shaped the current BYOG phase. However, combining an ELCC-like approach with the AESO's Phase 1 eligibility framework could be productive. Categorically excluding energy storage and renewable energy in the Phase 2A process limits the Government of Alberta's ability to achieve its AI data centre development goals and attract investment to Alberta and the electricity system. At minimum, the AESO should permit the use of 8-hour energy storage, given that 6-hour storage outperforms simple-cycle gas turbines in PJM.

A recent BRC-Canada analysis of the GHG Protocol's proposed amendments to Scope 2 accounting found that, in a simplified case, wind and solar resources in Alberta combined with storage and demand response could provide 24/7 power across 19 different industrial loads. In other words, this assessment considered an "islanding" approach to generation and load. While these 19 sectors did not include data centres, the analysis is indicative of the potential for hybrid energy, storage, and demand response to robustly meet industrial energy needs without threatening grid resource adequacy.⁵

3. Do you agree with the ratio for generation to load required for BYOG? If not, please provide an alternative and explain the methodology behind it.

¹ PJM, "Effective Load Carrying Capability (ELCC)." <https://www.pjm.com/planning/resource-adequacy-planning/effective-load-carrying-capability>

² Astrapé Consulting, "Effective Load Carrying Capability Study: Final Report," (ERCOT, 2025). https://www.ercot.com/files/docs/2025/02/12/2024ERCOT_ELCC_Study_Final_Report02112025.pdf

³ Commission for Regulation of Utilities, "The CRU Publishes its Decision on New Electricity Connection Policy for Data Centres," December 12, 2025. <https://www.cru.ie/about-us/news/the-cru-publishes-its-decision-on-new-electricity-connection-policy-for-data-centres/>

⁴ IESO, "Long Term 2 (LT2) RFP - Window 2," June 16, 2026, 10. <https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/long-term-rfp/iesolt2-20260615-engagement-presentation.pdf>

⁵ Business Renewables Centre-Canada, *Momentum at Risk* (2026). <https://businessrenewables.ca/resource/momentum-at-risk>

As stated above, the AESO should use a technology-agnostic, performance-based approach to determine the generation parameters required for the BYOG process. The AESO should also clarify the system issues it is seeking to protect against and the related performance criteria applicants must meet.

4. The [Data Centre Regulation](#) includes provisions for underutilized facilities. Please provide your feedback on underutilized facilities in relation to the BYOG process.

- a) How would you define an underutilized facility for the purpose of BYOG?

Given increasing congestion in several parts of Alberta, and the lengthy process required to modernize transmission infrastructure to alleviate that congestion, congested generation should be considered underutilized. However, including these facilities should not be viewed as a substitute for infrastructure modernization. The slower pace of southeast transmission planning and execution to date has already contributed to stalled investment in new generation projects in some of Alberta's most resource-abundant regions.

- b) Should the proposed BYOG process apply to underutilized facilities?

BRC-Canada is pleased that the Government of Alberta's *Data Centre Regulation* specifically mentions energy storage as a possible form of underutilized facility. We would like to see the AESO BYOG process similarly recognize the opportunities of energy storage to contribute to grid reliability and investment, either standalone or in hybrid facilities. Further, given the substantial congestion of renewable assets in the province, BRC-Canada recommends that pursuant to a technology agnostic standard renewable energy facilities be considered as underutilized assets in the BYOG program.

5. Please provide any other comments you have about load applicability, generator qualifications, or the tethering ratio for the BYOG process.

Data centre development should be expected to continue, given the pace of development to date and the Government of Alberta's goals to attract investment in this sector. By limiting the BYOG process to thermal generation rather than applying performance-based criteria, the AESO will constrain the pace of development. Gas generator supply chains are constrained,⁶ and, as TD Bank recently highlighted, renewed renewable energy and energy storage development could help power data centre growth in Alberta.⁷

Instead, developers should be given flexibility to demonstrate that they can meet the AESO's technical requirements. As noted above, several U.S. system operators have recognized that solar or wind projects can be paired with energy storage technologies to match the technical performance of gas-fired options.

⁶ Aaron Larson, "Gas Turbine Supply Chain Bottlenecks Could Reshape the Generation Mix in 2030 and Beyond," *POWER*, January 15, 2026. <https://www.powermag.com/gas-turbine-supply-chain-bottlenecks-could-reshape-the-generation-mix-in-2030-and-beyond/>

⁷ Likeleli Seitlheko, "Bridging Alberta's AI Data Center Power Gap: A Case for Renewables," June 16, 2026. <https://economics.td.com/esg-data-centers-and-renewables-alberta>

Project Readiness

6. Do you agree with the proposed terms and conditions for tethering? If not, please identify any terms you would suggest adding or removing, along with rationale.

We suggest that the AESO grant flexibility for new data centres to be tethered to multiple new generators so long as ISD timelines are aligned or that generation is built first. This approach can be moderated with parameters such as limiting the total number of participating developer organizations or accelerating projects that are found in a Cluster Assessment to be in a low congestion area.

7. Do you agree with the approach taken on the BYOG checklist? If not, please explain what changes you would make, the rationale for those changes, and how they would support the goals of project readiness. Please categorize your changes under headings, like the following:

- a) Changes to the mandatory items
- b) Changes to the scored items
- c) Changes to scoring requirements or approach

BRC-Canada appreciates the thoughtful checklist developed under tight timelines. However, we are unable to provide specific feedback to the checklist because the BYOG process misses opportunities for rapid data centre development that is net beneficial for the electricity grid and for Albertans, especially for renewable energy and storage in Alberta, we cannot comment on the checklist at this time.

8. Do you agree with the proposed fees and security requirements for the BYOG process? If not, please provide recommended alternatives and explain how they would support the goals of project readiness.

No comment.

9. Please provide any other comments you have about project readiness in the BYOG process.

No comment.

Execution

10. Do you agree with the length of the intake window? If not, please explain how long the intake should be and why.

No comment.

11. Do you agree with the approach to studies for the BYOG process, including decision points and off ramps? If not, please recommend alternative approaches and explain the rationale for each.

No comment.

12. The AESO has proposed that available system capacity for an area is pro rata split when multiple projects are locating in that area and there is a need for system development.
- a) Do you agree that pro rata is an appropriate way to allocate available capacity? Please explain why or why not.
No comment.
 - b) Should the AESO instead implement a tie-breaker approach to allocating available capacity? If yes, please provide suggestions on what suitable tie breakers would be and why.
No comment.
 - c) Please provide any other recommendations for how the AESO should allocated limited system capacity in an area when multiple projects apply.
These situations would be well fit for the AESO to procure transmission-connected storage and other non-wire alternatives.
13. Please provide any other comments you have about execution of the BYOG process.
No comment.

Bridging Option

14. Do you agree with the 1600 MW bridging limit and the methodology used to determine that limit? If not, please explain how you would arrive at a limit for bridging and why.
No comment.
15. Do you agree with the approach for allocating the bridging limit? If not, please provide an alternative allocation methodology and rationale.
No comment.
16. Do you agree with the progress milestones required to apply for and retain a bridging allocation? If not, please provide alternate milestones or an alternate approach to progress checkpoints, with rationale.
No comment.
17. Please provide any other comments you have about the bridging option in the BYOG process.
No comment.

Overall BYOG Process

18. Are there any other comments on the BYOG process that you would like to provide for the AESO's consideration?

The Government of Alberta's *Data Centre Regulation* and the AESO's BYOG process have built momentum for Alberta to attract investments that are being made around the world. With the proper amendments, Alberta could develop a world-class approach to data centre development while also creating a better balance of energy in the province, reducing costs for ratepayers and reducing greenhouse emissions at the same time.

Most notably, the AESO should recognize that major data centre operators have declared their intentions to match their load with low-emitting energy supply, mainly from wind and solar resources. Meta's recent announcement to develop a data centre in Sturgeon County emphasized its commitment to covering 100% of its annual electricity consumption with renewable energy, as it has already achieved in most of its facilities globally.⁸ To-date, Meta has already helped to add 30 GW of clean energy globally.⁹ Google aims to reach 24/7, or hourly, renewable energy matching by 2030 for all of its data centre operations.¹⁰ Microsoft and Amazon both have similar objectives.

As proposed, the AESO's BYOG process is increasing the cost of development for data centres. By only permitting thermal generation when data centre operators are looking for more clean energy, the Phase 2A process will contribute to overbuilding the electricity system.

On the other hand, a performance-based approach to BYOG generation would support innovation in the electricity system. Several data centres around the globe have made final investment decisions to deploy long duration energy storage, including Google's Minnesota facility with a 100-hour iron-air battery, 1.4 GW and 200 MW of nearby wind and solar, respectively.¹¹ This project has the potential to demonstrate the value of both 100-hour duration storage and iron-air technology to electricity grids. In Alberta, data centre developers could help advance storage, geothermal, SMRs, and other clean forms of electricity generation for use in Alberta, across Canada, and to global markets.

⁸ Meta, "Data Centres." <https://datacenters.atmeta.com>

⁹ Meta, "Energy." <https://sustainability.atmeta.com/energy/>

¹⁰ Google Cloud, "Five years of 100% renewable energy – and a look ahead to a 24/7 carbon-free future," June 23, 2022. <https://cloud.google.com/blog/topics/sustainability/5-years-of-100-percent-renewable-energy>

¹¹ Ryan Kennedy, "Google to deploy world's largest iron-air battery for Minnesota data center," *pv magazine*, February 24, 2026. <https://pv-magazine-usa.com/2026/02/24/google-to-deploy-worlds-largest-iron-air-battery-for-minnesota-data-center/>