# Feedback Form - Public

# Interruptible Rate Pilot: Initial Design Elements – October, 2022

#### Feedback Provided by:

Name: Matthew Fairloie Title: Vice Chair Organization: Next Hydrogen Solutions Inc Email: \_\_\_\_\_\_\_\_ Date: November 1, 2022

Following the focused consultation sessions with potential pilot participants, the IESO is seeking feedback on a number of questions related to initial design elements of the Interruptible Rate Pilot.

Please provide feedback by November 1, 2022 to <u>engagement@ieso.ca</u>. Please use subject header: *Interruptible Rate Pilot*.

To promote transparency, your responses in this public feedback form will be posted on the <u>Interruptible Rate Pilot webpage</u>, unless otherwise requested by the sender. If you would like to submit feedback confidentially, please use the additional feedback form labeled as 'Confidential'.

The IESO will consider and work to incorporate comments, as appropriate, and provide responses at a follow-up session with potential pilot participants in November 2022. Thank you for your valuable contribution to the consultation process.



## Public Feedback: Specific Questions

Please note: Responses in this section will be posted on the Interruptible Rate Pilot engagement webpage.

Торіс	Feedback
Please provide feedback on the draft eligibility criteria and interruption process, including in particular the following square bracketed parameters that are contained in the IESO's consultation deck:	Regarding draft eligibility
	Hydrogen plant operators are exempt from peak demand requirement in this Pilot
On slide 9, re: draft eligibility criteria: - have peak demand of at least [5] MW - have the capability to interrupt at least [20- 50%] of its peak demand for four hours - have a maximum of [20-50] MW of curtailable demand	We should be able to meet the 50% of peak demand criteria.
	We are well below the maximum.
On slide 11, re: interruption events: - subject to a maximum of [40-100] interruption hours and [10-20] events per year	We are not impacted by the number of interruption events. Hours of interruption equate to lost productivity so there should be an incentive to committing to more hours. In general
On slide 13, re: contract demand dead-band: - If actual demand is greater/lower than a [±5%] dead-band around the contract demand, then	we would prefer more interruption events of shorter duration.
non-performance/incentive rates would apply	Actual reductions may be harder to achieve because equipment may not be scheduled to run at the time an interruption event is called. That said we can be certain that loads will not be connected when the call is made. If our demand drop exceeds the contracted demand, we would like to better understand how this would be a problem for the operator.
Please provide feedback on the five rate design options that Brattle presented. Which options do you prefer and why? What options are you the most opposed to and why? Do you prefer the use of a "fixed" (i.e., constant throughout the pilot) or "floating" (i.e., changing based on monthly Global Adjustment) pilot settlement?	The best option for us would be HOEP + demand charge or HOEP + fixed charge + demand charge. We can monitor our systems to achieve the best performance. The other options are more complicated
	Floating Pilot rate gives us greater control over costs. We won't be surprised by "true up" mechanism at the end of the year.

Topic	Feedback
Please provide any feedback on the proposed method of exiting the pilot (as described on slide 14 of the IESO's consultation deck)?	Our test facility doesn't qualify as a Class A today. We would be seeking to extend the program as long as possible and then shift to ICI (expecting our total demand to grow over Pilot period with expansion of enterprise)
Do the tentative project timelines work for you to participate in the pilot (see slide 7 of the IESO's consultation deck)?	Yes. We expect to have firm commitments regarding test program and the demand that can be contracted by the beginning of the year.

### Public Feedback: General Comments

This is an opportunity for our equipment to operate in the manner in which it was intended and will provide operating experience for future commercial plants. The savings for us will be significant.