Feedback Form - Public

Interruptible Rate Pilot: Initial Design Elements – October, 2022

Feedback Provided by:

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Date: October 25, 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 October 28, 2022 to engagement@ieso.ca. Please use subject header: *Interruptible Rate Pilot*.

To promote transparency, your responses in this public feedback form will be posted on the Interruptible Rate Pilot webpage, 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.

Topic	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: 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 On slide 11, re: interruption events: - subject to a maximum of [40-100] interruption hours and [10-20] events per year On slide 13, re: contract demand dead-band: - If actual demand is greater/lower than a [±5%] dead-band around the contract demand, then non-performance/incentive rates would apply	The minimum demand of 5 MW is too high, hence limiting the number of potential participants. 20%-50% curtailable demand is very high. If we're understanding this correctly, a facility with a 5 MW demand will have to curtail at least 1 MW. Regarding this curtailment, can it potentially be done by installing a BESS for the 4 hour period? 40-100 interruption hours in 10-25 events is very high. We're talking about 4 hours per event, which will be OK, but not for 10-25 events. We think the number of events needs to be reduced. The dead-band of 5% around the contract demand is fine. However, the incentives would need to be quantified beforehand. In a similar way, it's our understanding that if the participant doesn't meet the contracted demand during the events, the participant will be penalized. It's important to know beforehand what those penalties or rates are if this happens.

Topic	Feedback
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?	We find that the options presented are not clear enough. • It's not clear if IESO will provide to customer a minimum price bid or not. • It's assumed that IESO's price bid is the starting point. • It's not clear when the price bid from IESO will be presented to the customers, although the deadline for participating and issuing the price bid is already established. • The simplest one is HOEP + Demand. • The "Floating" option is much better than the "Fixed" option, as reduces risks. • The preferred options are: 1. HOEP + Demand but floating and 2. HOEP + Demand + Volumetric.
Please provide any feedback on the proposed method of exiting the pilot (as described on slide 14 of the IESO's consultation deck)?	The proposed "Exiting of the Pilot" structure is fine, as it gives the participants the opportunity to exit the 3-year program every year, and it returns to the participant the peak demand factor (pdf) they had prior from entering the program. Although, we suggest tabulating the pdf of each participant during the program and using not the one prior from entering the program, but the minimum pdf between what the participant had and what was achieved during the 3 year program. In this way, if the participant is investing in GA reduction, they will see the benefits of it.
Do the tentative project timelines work for you to participate in the pilot (see slide 7 of the IESO's consultation deck)?	Yes, the deadlines will work but IESO needs to clarify when is IESO releasing the minimum price bid for the rate structure, so the participants can do their estimates and prepare a structure price bid by the deadlines suggested.

Public Feedback: General Comments

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