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IESO Stakeholder Engagement

Submitted via email

RE: DRWG Stakeholder Feedback – Improvements to Hourly Demand Response (HDR) Utilization

Dear Stakeholder Engagement,

Resolute Forest Products appreciates the opportunity to provide comments on the options the IESO is considering that would improve the utilization and efficiency of the overall Hourly Demand Response (HDR) program.

The IESO has identified three areas in which to review potential changes and requesting feedback on resulting impacts to the; (1) standby notice, (2) activation notice time and (3) duration of activations.

While not all HDR is equivalent and understandably may be affected differently by any change, Resolute would like to identify impacts the changes to the above three options would create.

Eliminating the standby notices would mean the HDR resources would be available for activation every day within the availability window without first receiving a standby notice. The result of doing this would limit the ability to provide the full amount of contracted Demand Response and under some circumstances no HDR would be available for activation.

For the activation notice time, if the IESO shortens the window from 2.5 hours to a closer time in advance of real-time, this would create the potential for a market rule violation on the embedded generator as the unit requires the 2.5 hour window to change the quantity of the offer, which would be a requirement if the load were to be reduced for the activation.

It is understood that shortening the DR activation duration will increase the precision in which the IESO would be able to dispatch HDR. From an operational standpoint, there would be no negative impact reducing the duration of activations from 4 hours to 1 or 2 hours and from a market perspective, this flexibility would be an improvement to system needs. Resolute fully supports this option.



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Resolute is pleased to submit stakeholder feedback on the identified options and continues to look forward to working with the IESO on the DRWG initiative in Ontario. It is recognized that improvements will provide better utilization of the available resources when system need dictate providing overall, greater value of the HDR product.

Regards,

Cara Degelman

Resolute Forest Products