



GerdaU comments on the materials presented at the May 30<sup>th</sup> DRWG meeting.

#### Notification and Activation of HDR Resources

##### Standby Notices

One of the reasons industrial loads participate in HDR instead of as a Dispatchable Load is the existence of the standby notice. Some industrial loads need advanced notice and longer lead times to prepare for curtailment which may include preparing equipment for shutdown, scheduling production; shipping; and maintenance activities.

Based on this GerdaU recommends the IESO maintain the status quo (Day-Ahead and Day-Of) for Standby Notices.

##### Standby and Activation Notice Criteria

GerdaU agrees that to add efficiency to the program a lower threshold could be used as the criteria to issue standby notices instead of using a participant's bid price. But, the threshold level should be discussed in detail before landing on a value. Due to the sometimes wide band of shadow prices across the province, the threshold should consider gas price, zone, generator availability, etc. The threshold should not be a static value but allowed to change as conditions change.

GerdaU agrees with the proposal to schedule activations for 1-4 hours depending on how many consecutive hours are economic.

Additionally GerdaU suggests that if a participant is activated in pre-dispatch and then as real time approaches the system no longer requires the activation, the participant should be released from mandatory participation.

GerdaU is very pleased to provide comments on this initiative and recommends further discussion on the threshold level for standby notifications takes place at future stakeholder meetings. It is recognized that improvements to the HDR product will provide benefit to all consumers of electricity in Ontario.

Regards,

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