

## **Pattern Energy**

Pattern Energy identified an issue with the proposed pre-approval criteria for generating facilities unable to store their fuel, specifically wind generators. The currently proposed criteria would allow a generating facility to submit a de-rating for pre-approval as long as the de-rating was above the two business day-ahead production forecast. This approach would ensure the IESO would only be approving a capacity reduction if it was above the energy forecast. The criteria failed to address the fact that any de-rating submitted above the forecast would effectively reduce that same forecast to a level below the pre-approval threshold as fewer wind turbines would be available for energy production.

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