

Feedback Form

Yes

2023 Annual Acquisition Report (AAR) – February 23, 2023

Feedback Provided by:

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Date: 2023-03-09

Following the February 23, 2023 engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the items discussed during the webinar. The webinar presentation and recording can be accessed from the [engagement web page](#).

Please submit feedback to engagement@ieso.ca by March 9. If you wish to provide confidential feedback, please submit as a separate document, marked "Confidential". Otherwise, to promote transparency, feedback that is not marked "Confidential" will be posted on the engagement webpage.

Questions Directed at All Resource Types

Topic	Feedback
<p>Do you agree with the IESO recognizing market exit as an uncertainty and its intention to consider that some facilities exit the market in its analysis?</p>	<p>Yes it is an uncertainty. Different assets, including within their generation types, will have different life spans due to design, location and how the asset was maintained. If you include the lack of interest and forward looking revenue opportunities that the IESO has presented over the last 5yrs, generators mostly are taking a wait and see approach. The longer that this progresses, the less options and higher risk of exit occurs.</p>
<p>Do you expect your facility to participate in the next 5-10 years?</p> <p>What are some considerations that may impact participation?</p>	<p>Yes.</p> <p>Lack of a program and/or planning by the IESO prior to contract expiry.</p> <p>Also, if no contracts are in place, minimal Market revenues (capacity and low energy pricing) vs costs of an aging fleet.</p> <p>Opportunities elsewhere.</p> <p>Continual uncertainty for market participants (market renewal, changing interpretation of contracts, downloaded risk of inflation and future changes etc)</p>
<p>Facilities require regular maintenance and operational activities throughout their lifecycle. At what year of life would your facility require significant capital investments to extend its usable life? How long of a commitment would you expect to pay-off significant capital investments?</p>	<p>It will depend, but typically with sustained maintenance and a good platform, it is in the 18-25yr range.</p> <p>If significant capital is considered repowering a wind turbine, typically one would expect a recontracting of 10-20yrs. Longer time frames are acceptable if there are fair "off ramps" for new findings as an asset ages.</p>
<p>How can existing assets be maximized? What is needed for these facilities to stay and continue operation?</p>	<p>Rethinking value: A more balanced system that considers energy in addition to capacity as well as the valuation of automation and ramping that grid connected wind/solar generators provide.</p> <p>Engagement 2-3yrs prior to contract expiry to work out a smooth transition.</p>
<p>Is repowering your facility(ies) with a renewable fuel an option for future participation, and if so, what would be the earliest timeline for this?</p>	

Questions Directed at Natural Gas Facilities

Topic	Feedback
How do you interpret the expected Clean Electricity Regulations (CER) in terms of the impact on the future operation of your facilities, including for emergency use purposes?	Click or tap here to enter text.
What impact will the rising federal carbon price have on the operation of your facilities in 2030 and beyond?	

Other

Topic	Feedback
Has the IESO missed any considerations in terms of the future participation of existing resources?	Click or tap here to enter text.

General Comments/Feedback

Click or tap here to enter text.