

# Feedback Form - Public

## Interruptible Rate Pilot: February 7, 2023

### Feedback Provided by:

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Date: February 17, 2023

Following the February 7<sup>th</sup> engagement webinar on the Interruptible Rate Pilot, the IESO is seeking feedback from participants on how the design proposal has been captured and detailed in the draft Pilot documents.

**Please provide feedback by February 20, 2023 to [engagement@ieso.ca](mailto:engagement@ieso.ca).** Please use subject header: *Interruptible Rate Pilot*. To promote transparency, this feedback, if provided in an AODA-compliant format (e.g. using this form) will be posted on the [Interruptible Rate Pilot webpage](#), unless otherwise requested by the sender.

The IESO will work to consider feedback and incorporate comments as appropriate and post responses on the engagement webpage.

## Draft Pilot documents

Topic	Feedback
Feedback on the Pilot Rules, e.g., re: eligibility, application process, contract offer process, etc.	<p data-bbox="868 226 1518 499">During the Stakeholder webinar, when questioned on the reasoning for the requirement of Dispatchable Loads to remove OR offers for the entire day if a Long-Notice event is called, the IESO response suggested that this was in response to a reliability issue but didn't provide any basis for that suggestion.</p> <p data-bbox="868 546 1518 856">In AMPCO's submission, the removal of up to 200 MW of OR bids <u>for the entire day</u> from the OR stack would have a far greater potential to threaten reliability than just removing the bids during the activation window. Certainly removing OR bids from the stack will create upward pressure on OR price and therefore will increase system costs.</p> <p data-bbox="868 903 1518 1054">Dispatchable Loads would have no incentive to be dispatchable in real-time and will likely pull Energy bids and be Non-dispatchable adding additional uncertainty to the IESO Control Room.</p> <p data-bbox="868 1100 1518 1369">The IESO indicated they would review this issue with the right personnel and provide the rationale for the decision. If there is a reliability concern this should have been addressed in the Accessibility of OR initiative proposed rule changes already recommended for IESO Board approval now.</p> <p data-bbox="868 1415 1518 1726">AMPCO looks forward to the clarity expected from the IESO response and urges the IESO to carefully reconsider the requirement. If there are specific NERC or NPCC standards that would be impacted by this OR issue, AMPCO requests that the IESO highlight this and explain how elimination of OR bids for an entire day will remedy the issue.</p>

Topic	Feedback
Feedback on the Pilot Contract, e.g., re: interruption process, performance obligations, payment obligations, settlement exhibit (i.e., Exhibit F), etc.	
Feedback on the Standard Definitions.	
Feedback on the Application Form, Fixed Price Bid prescribed form, and Load Reduction Plan prescribed form.	

## General Comments

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