

Feedback Form - Public

Interruptible Rate Pilot: February 7, 2023

Feedback Provided by:

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Date: 2023-02-20

Following the February 7th 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. 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 382">“2.2 Eligible Facilities: (g) have been connected to a Transmission System or Distribution System as of May 1, 2022”</p> <p data-bbox="868 430 1518 661">This eligibility requirement disqualifies newly developed facilities. Atura Power would recommend that this eligibility date be changed for the hydrogen-specific pilot to allow facilities to connect up to and including the timeframe that the pilot is active.</p> <p data-bbox="868 709 1518 865">Atura Power supports the concept of a hydrogen-specific rate Pilot and is interested in participating in consultations with IESO in respect of this hydrogen Pilot design.</p> <p data-bbox="868 940 1518 1060">“(J) be capable of participating in the Pilot with the entirety of its Peak Demand (i.e. no “partial participation”)</p> <p data-bbox="868 1108 1518 1339">For the hydrogen-specific Pilot or Program, partial load of a hydrogen production facility should be eligible for participation, so long as the participation demand exceeds the minimum Interruptible Demand as determined within the hydrogen-specific Pilot, in order to:</p> <ul data-bbox="917 1344 1518 1617" style="list-style-type: none">- allow for facilities beyond the potential maximum Interruptible Demand threshold to participate in the pilot; and- offer flexibility to hydrogen producers participating in both the hydrogen-specific pilot, and the Real-Time Market through Operating Reserve Offers.

Topic	Feedback
	<p data-bbox="868 170 1390 239">“(k) have a maximum Interruptible Demand of 50 MW”</p> <p data-bbox="868 289 1484 478">This maximum should be removed or increased to 100 MW for the hydrogen-specific Pilot to enable facilities with greater capacity to contribute benefits of grid regulation over the Pilot timeframe.</p> <p data-bbox="868 529 1463 638">This feedback aligns with (j) above – this maximum should be allowable with a partially participating hydrogen production facility.</p> <p data-bbox="868 726 1484 758">“10.1 Assignment and Change of Control”</p> <p data-bbox="868 808 1511 1035">Applicants should have the ability to assign their application to another entity within the same corporate structure of any parent company of the applicant (Affiliate) in line with the provisions for a Participant to assign the Agreement outlined in the IRP Contract sections 13.5 (b) and 13.6 (b).</p>
<p data-bbox="188 1115 784 1251">Feedback on the Pilot Contract, e.g., re: interruption process, performance obligations, payment obligations, settlement exhibit (i.e., Exhibit F), etc.</p>	<p data-bbox="868 1115 1170 1150">“13.5 (b) / 13.6 (b)”</p> <p data-bbox="868 1201 1495 1310">As stipulated in these sections, Assignment and change of Control should be outlined in the Pilot Rules.</p>
<p data-bbox="188 1388 683 1419">Feedback on the Standard Definitions.</p>	<p data-bbox="868 1388 1045 1419">No Feedback.</p>
<p data-bbox="188 1524 834 1629">Feedback on the Application Form, Fixed Price Bid prescribed form, and Load Reduction Plan prescribed form.</p>	<p data-bbox="868 1524 1045 1556">No Feedback.</p>

General Comments

Developing a resilient supply of made-in-Ontario low-carbon hydrogen production capacity will require a reflection in price of the benefits that grid-connected hydrogen production can offer for grid stability. This price certainty should be maximized by being de-coupled from HOEP, and available for contracted terms of up to 30 years.

Hydrogen producers require cost certainty and predictability to make the capital investment in hydrogen production facilities in Ontario. Atura Power encourages the IESO to consider a flat-rate Pilot for electrolytic hydrogen producers in Ontario who participate in the hydrogen-specific Pilot. The flat-rate should be commensurate with adjacent jurisdiction flat-rates for hydrogen production (i.e. Quebec, New York) and the Pilot should run for a minimum of 10 years with the intent of transitioning this model to an electrolytic hydrogen production specific rate offered by IESO to hydrogen producers in Ontario under long-term contracts. Electrolytic hydrogen production as a load can provide significant value to the grid with regulation service, ramping up and down quickly, interruptible operation, and timely response. Further, the hydrogen produced will support the decarbonization of Ontario, along with electrification.

Atura Power appreciates the work that the IESO has contributed towards developing the IRP, and looks forward to seeing the feedback above incorporated into a future hydrogen-specific Pilot or program.