GHGID 1019

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Public Comment on ERO 019-7649

Our facility is a Combined Cycle Cogeneration Power Plant operating in Eastern Ontario. As a cogeneration facility, our main sources of emissions come from the generation of electricity and from the creation of useful energy in the form of steam created using an Auxiliary Boiler. While the system originally was designed to be interconnected, they are now separate systems.

The electrical generation is exported offsite to support Ontario’s energy requirements and is created using a combination of a gas and steam turbine. The emissions come from the gas turbine generating unit, which is coupled with a heat recovery steam generator (HRSG) to increase system efficiency. This HRSG in turn generates steam which solely feeds into a steam turbine for electrical generation.

The separate steam system fed from the Auxilary Boiler, which provides useful energy, feeds both onsite demand and a neighboring company’s load. The steam is used onsite for heating, water treatment, and equipment/facility long term reliability. The neighboring company uses the useful energy for the creation of food and food byproducts. Out of the total useful energy created, the majority is exported offsite for their process.

We believe there is a gap in current legislation for Cogeneration facilities in which Methodology C cannot be applied unless the facility also qualifies for either Methods D or E. This ensures cogeneration facilities not covered under Methods D or E to not receive emission credits for the production of useful energy. This is due to the wording in Method C section (b) which states, “The Owner or operator of a facility described in subsection (a) may not use formula 3.1.3-1 to calculate the AAELc, if any of paragraphs (1)-(4) apply:” “(4) The owner or operator has not included any useful thermal energy in the TETy used in any applicable Formula under another Method” By adding the additional “not” in section (4), this requires you to have used the useful energy in another AAEL calculation, which would then create a sort of double dipping when combined with AAELc. We believe the original intent was to have paragraph (4) state “The owner or operator has included any useful thermal energy in the TETy used in an applicable Formula under another method.”

Under current wording, we will be required to use Method B, which does not account for any of the useful steam created. This amounts to a reduction in expected TAEL, and ultimately an undue increase in cost. We ask that a revision be made to Method C to allow cogeneration facilities to receive AAEL credits for useful energy created, even when not covered under another Methodology.

Thank you for your time and consideration.