

**POWER
WORKERS'
UNION**

January 15, 2024

Independent Electricity System Operator
1600-120 Adelaide Street West
Toronto, ON M5H 1T1

Via email to engagement@ieso.ca

Re: IESO Market and Planning Data Questionnaire

The Power Workers' Union ("PWU") represents a large portion of the employees working in Ontario's electricity industry. Attached please find a list of PWU employers.

The PWU is pleased to provide its responses to the IESO's questionnaire on Market and Planning Data. The PWU is a strong supporter and advocate for the prudent and rational reform of Ontario's electricity sector and recognizes the importance of low-cost, low-carbon energy to the competitiveness of Ontario's economic sectors. The PWU believes that IESO should support energy delivery at the lowest reasonable cost while stimulating job creation and growing the province's GDP.

The PWU uses this data to create models of Ontario's electricity system for the purposes of independently and transparently assessing and validating the IESO's recommendations and communicating this information to other key stakeholders. The PWU frequently accesses actual and forecast market pricing, generation performance, intertie flows and demand data on a provincial as well as the regional level in 8760-hour formats.

We hope you will find the PWU's comments useful.

Yours very truly,

Jeff Parnell
President

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List of PWU Employers

Abraflex
Alectra Utilities (formerly PowerStream)
Algoma Power
AMEC Nuclear Safety Solutions
Aptum (formerly Cogeco Peer 1)
Atlantic Power Corporation - Calstock Power Plant
Atlantic Power Corporation - Kapuskasing Power Plant
Atlantic Power Corporation - Nipigon Power Plant
Bracebridge Generation
Brighton Beach Power Limited
Brookfield Power Wind Operations
Brookfield Renewable Power - Mississagi Power Trust
Bruce Power Inc.
Canadian Nuclear Laboratories (AECL Chalk River)
Chapleau Public Utilities Corp.
Centre Wellington Hydro
Collus Powerstream
Compass Group
Cornwall Electric
Corporation of the County of Brant
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Enova (formerly Kitchener-Wilmot & Waterloo North)
Enwave Windsor
Epcor Electricity Distribution Ontario Inc.
Erth Power Corporation (formerly Erie Thames Powerlines)
Erth Corporation
eStructure
Ethos Energy Inc.
Great Lakes Power (Generation)
Greenfield South Power Corporation
Grimsby Power Incorporated
Halton Hills Hydro Inc.
Hydro One Inc.
Hydro One CSO (formerly Vertex)
Hydro One Sault Ste. Marie (formerly Great Lakes Power Transmission)
Independent Electricity System Operator
InnPower (Innisfil Hydro Distribution Systems Limited)
Kinectrics Inc.
Lakeland Power Distribution
Laurentis Energy Partners
London Hydro Corporation
Milton Hydro Distribution Inc.
Mississagi Power Trust
Newmarket Tey/Midland Hydro Ltd.
North Bay Hydro
Northern Ontario Wires
Nuclear Waste Management Organization
Ontario Power Generation Inc.
Orangeville Hydro Limited
Portlands Energy Centre
PUC Services
Quality Tree Service
Rogers Communications (Kincardine Cable TV Ltd.)
Sioux Lookout Hydro Inc.

August 2023

SouthWestern Energy
Synergy North (formerly Kenora Hydro Electric Corporation Ltd.)
Tillsonburg Hydro Inc.
The Electrical Safety Authority
Toronto Hydro
TransAlta Generation Partnership O.H.S.C.
Westario Power

Power Workers' Union Submission on the IESO's Market and Planning Data Questionnaire

January 15, 2024

The Power Workers' Union (PWU) is pleased to respond to the Independent Electricity System Operator (IESO) Market and Planning Data Questionnaire that was tabled during the November 2023 Stakeholder Engagement days. The PWU remains a strong supporter and advocate for the prudent and rational reform of Ontario's electricity sector and recognizes the importance of planning for low-cost, low-carbon energy solutions to enhance the competitiveness of Ontario's economy.

We understand that the IESO launched this engagement to better inform it on providing greater access to Market and Planning Data. The IESO described its intended use of the feedback from its recent jurisdictional review and the input gathered from this IESO questionnaire. The feedback will be used to inform future decisions regarding the data available for access while ensuring a balance between transparency and security in the evolving landscape of electricity system Market and Planning data.

The PWU provides the following responses:

IESO Question: *What organization/stakeholder group do you represent and what is your key interest in this engagement?*

The PWU is the largest electricity sector union in Ontario representing men and women who help keep the province's lights on. PWU members work in electricity generation, transmission, distribution, storage, research, and regulation. The PWU has successfully worked with the IESO and other energy stakeholders in collaborative partnerships over the past seventy-five years. We remain committed to working with the IESO and other energy stakeholders to strengthen and modernize Ontario's electricity system. The PWU is committed to the following principles: Create opportunities for sustainable, high-pay, high-skill jobs; ensure reliable, affordable, environmentally responsible electricity; build economic growth for Ontario's communities; and, promote intelligent reform of Ontario's energy policy. The PWU actively supports most IESO stakeholder engagements and strives to provide independent, fact-based information and constructive commentary. This is facilitated by the availability of comprehensive, transparent information about Ontario's electricity system operations and the IESO's forecast of future implications and underlying assumptions.

IESO Question: *Can you comment on the type or types of Planning and/or Market data that you access from the IESO? Do you have any feedback for the IESO about the Planning and/or Market data that is currently made available to stakeholders?*

The PWU frequently accesses actual market pricing, generation performance, intertie flows and demand data on a provincial as well as the regional level in 8760-hour formats. The PWU also extensively uses the forecast demand and generation data that has typically accompanied the release of the Annual Planning Outlooks.

The IESO has recently altered the formats of some of this information e.g., generator output and capabilities. Currently the IESO makes this data available via daily summaries. The data is far more useful if provided in an annual 8760-hour format. While these formats are available upon request, a downloading capability on the IESO's website would be preferable.

With respect to APO related data tables, the underpinning 8760-hour data by year for all parameters would be helpful for enabling stakeholders such as the PWU to develop models to assess and evaluate the IESO's conclusions.

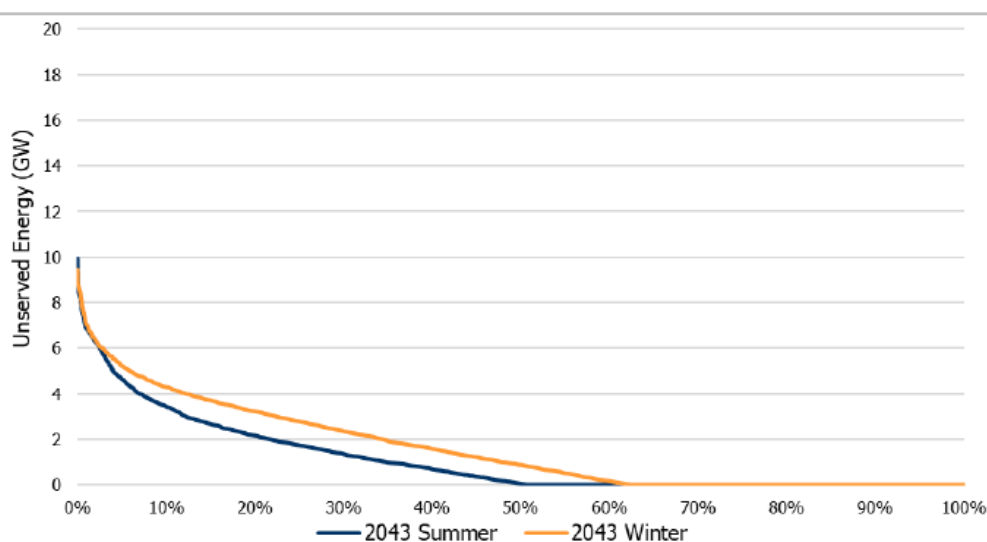
IESO Question: *What additional Planning and/or Market data is your organization seeking to access? If possible, provide the data sets of interest including specifics details in terms of granularity, format, etc.*

There are several relevant issues impacting demand on Ontario's electricity system as the economy is decarbonized. Making the **8760-hour data available by transmission zone and region both historically and by forecast year** would increase transparency in the planning process for Ontario's electricity system:

- Hourly demand
- Hourly generation output by generation type or by generator
 - o Including the state of charge of system storage resources
- Unserved and surplus energy
- Flows across interties with other jurisdictions
- Flows across Transmission connection points between transmission zones (e.g. FETT, etc.), including identification and management of the congestion constraints
 - o Incurred energy losses on the transmission system by transmission zone
- Hourly Ontario Electricity Price (HOEP) for the province and each Local Market Price
- Total system cost of energy by generation type including explicit statement of the cost of losses for each generator type.
- Cost assumptions by generator type for future supply cost estimation.

Where load curves are used, such as for the figure below from the IESO's 2022 APO, the IESO should make the data available that supports the load curve with the associated data point dates identified so the data can be calendarized into the typical 8760-hour format.

Figure 30 | Unserved Energy By Season, Case 2



IESO Question: Please elaborate on the need for and/or your intended use of the data. (e.g., use cases, etc.)

The PWU uses this data to create models of Ontario's electricity system for the purposes of independently and transparently assessing and validating the IESO's recommendations and communicating this information to other key stakeholders.

IESO Question: *If applicable, is there specific Planning and/or Market data that is currently not made available by the IESO that should continue to remain private or confidential? Please tell us the impact on your organization if such data is made available.*

The PWU has no confidential market and planning data that must be protected. All the data identified above should be and remain available to the public.