

# Stakeholder Engagement SE-57

## Response to Written Stakeholder Comments on Embedded Generation



On December 13, 2007, the IESO posted the Embedded Generation [stakeholder plan](#). Stakeholders were requested to send in written comments by January 17, 2008.

Two written comments were received, as summarized below along with the IESO comments.

### Canadian Solar Industries Association

The Canadian Solar industries Association (CanSIA) appreciates the opportunity to provide input on IESO's proposed stakeholder plan.

The Canadian Solar Industries Association's is the national trade association that represents the interests of over 200 solar industry companies across Canada. Ontario represents the largest membership base for the Association. CanSIA's mission is to develop a strong, efficient, ethical and professional Canadian solar industry, able to service an expanding domestic energy market, to provide innovative solar solutions to world energy problems, and to play a major role in promoting the transition to a solar energy future worldwide.

The Association concurs with the statement made in the IESO's Embedded Generation Discussion Paper that, "when connected to the distribution system, these smaller generators can make a significant contribution to the security of supply for Ontario consumers and to achieving the Government's objective for clean and renewable energy supply." We see solar as an important source of both existing and potential embedded generation for Ontario. The solar industry itself is now very diverse and includes solar farms, industrial/commercial applications and residential solar applications. Therefore, we believe that our input is important to this process.

CanSIA believes that it should be a part of this procedure. However, we believe that the proposed response time is very short. As this is a rapidly growing industry in Ontario focused on building businesses, most of the Association's membership does not have the large infrastructure required to respond quickly to government policy requests. This is especially true given that your process and the OEB's review of the OPA's IPSP are taking place almost concurrently.

It was CanSIA's intention to solicit the views of our membership on the plan and present this to the IESO in a way that would reflect the various views of our Ontario membership in a single comprehensive document. However, we had not begun this process as we were awaiting confirmation of this plan and we have had to divert resources to responding to the OEB on the IPSP. Preparing an internal analysis of the IESO materials, forwarding it to the membership and then writing a report that properly reflects the views of a diverse membership is simply not a task that can be done in just a few days. Therefore, we believe that the time between January 21 when the IESO intends to post its response to stakeholder feedback and the January 24th deadline for stakeholder submissions to be inadequate. We request an extension of that segment of the

stakeholder plan and we would suggest that a minimum of at least an additional two weeks should be added to this part of the process.

One of the greatest overall challenges that Ontario faces in terms of meeting its own objectives for renewable energy is that the administrative processes that are presently in place, or in some cases not in place at all, are generally setting up roadblocks or barriers which are almost impossible to overcome. Therefore, while the Ontario government has been proactive in establishing renewable energy objectives, the ability of the solar industry to contribute are being impeded.

We look forward to receiving your response,

### **IESO Response**

To accommodate soliciting feedback from your members, the deadline date for comments on the discussion paper has been extended to February 7, 2008. The stakeholder engagement plan will be updated to reflect this change.

### **Hydro One Networks Inc.**

Hydro One submits that the stakeholder plan up to Activity 6 is adequate. Hydro One suggests that additional activities need to be added between Activity 6 and Activity 7. The additional activities should identify the process by which stakeholders will have the opportunity to review and provide comments on the proposed wording of the market rule amendments.

The process should allow for all significant issues to be resolved before the proposed market rule amendments are submitted to the Technical Panel.

### **IESO Response**

An additional activity has been added to the stakeholder plan that will allow for issues to be resolved before the market rule amendments are submitted to the Technical Panel. The additional wording is "Discussions with stakeholders on potential solutions to issues that have been identified".