

Feedback Form

Bulk Study Updates (South & Central) – November 20, 2024

Feedback Provided by:

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Following the November 20, 2024, engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback on the items discussed during the webinar. The webinar presentation and recording can be accessed from the engagement web page.

Please submit feedback to engagement@ieso.ca by December 6, 2024. If you wish to provide confidential feedback, please submit as a separate document, marked "Confidential". Otherwise, to promote transparency, feedback that is not marked "Confidential" will be posted on the engagement webpage.

Topic	Feedback
What feedback do you have regarding the content delivered today?	<p>In feedback to ESC comments, the IESO stated the specific planning information and data requested by ESC was not available and pointed stakeholders to generic generation output data and load information. First, the data sources the IESO identified are not amalgamated or easily accessed without significant effort to download multiple reports and compile the data. This is a disappointing response and does not reflect a core principle of fair and transparent planning for the bulk transmission system. The inability to provide easily accessible and usable data results in significant red tape and bureaucratic barriers to stakeholder engagement and analysis. Second, if the IESO does not have the data requested by ESC to publish for stakeholder analysis, it is not clear how the IESO completed the analysis to justify the early action build plans that have been put forward. The plans proposed by the IESO are multiple billion-dollar investments. While these early actions are likely required; it is unclear why the IESO would not produce simple and clear data and analysis that would underpin their decision making. Third, the IESO bulk planning process does not include any new demand or generation development that would inform the transmission investments beyond generic comments that demand is growing. Finally, the IESO has produced no further data to justify the exclusion of Non-Wires Alternatives or scalability in their system plans. All of the above points will result in significant additional costs for ratepayers.</p>
Do you have feedback on the Early Actions identified? Are there considerations for future Early Actions that may be identified throughout the study for the IESO to take into consideration?	<p>Please see comments above related to limited data or information published by the IESO to justify their early action decisions.</p>

Topic	Feedback
<p>What level of detail is appropriate when screening 2050 needs and identifying preferred solutions?</p>	<p>First, ESC recommends that the IESO must reassess their unilateral approach to making solution recommendations. The IESO is a system operator and administrator with planning experience for the Ontario power system. The IESO are not experts in the development of transmission infrastructure, non-wires solutions or generation resources. Therefore, the IESO should be leveraging stakeholders and market participants to inform the scope of potential solutions to be assessed. Second, the technical working group leveraged by the IESO to support in identifying solutions have vested interests and financial returns tied to the solutions selected (i.e., rate-regulated utilities). This clear conflict of interest should be addressed immediately by the IESO before beginning any further analysis or solution development. To be clear, ESC believes that the IESO should work closely with the existing transmission and distribution facility owners to under system needs and constraints. The assessment of potential solutions should include a broader group of stakeholders and system experts to ensure the best solutions are considered before planning analysis and decisions can be made. Third, the IESO should publish detailed planning information and data on the potential future state of the Ontario power grid and expectations. This includes sub-regional or locational demand forecasts, future generation resource mix, and existing transmission system capabilities (i.e., thermal transfer capability). Without this information, it is impossible for stakeholders to provide any informed feedback to support or objective to decision making by the IESO. Finally, the IESO has provided no information on the planning objective changes under the new Market Renewal Program. The benefit of adopting Locational Marginal Pricing (LMP) was supposed to support market data information to inform resource siting and operational decision making. Early investments in minimal data severely undercuts the ability of investors and market participants to leverage the benefits of LMP.</p>

General Comments/Feedback

Planning data and market information is required for fair, equitable and transparent stakeholder engagement processes related to bulk planning decision making. The IESO cannot continue to operate planning in vacuum without appropriate engagement with stakeholders. Failure to do so will result in higher costs and delays to critical infrastructure needs. Further, withholding this information is contrary to the government's objective of reduced regulatory burden and red tape reduction. As an agency of the government, the IESO must do better.