Feedback Form

Central-West Bulk Planning – August 16, 2023

Feedback Provided by:

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Following the August 16 engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders 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 **August 29, 2023**. 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 scope of work proposed?	ESC appreciates the opportunity to provide feedback on the Central-West Bulk Study. ESC believes the study purpose is missing several critical issues. First, the IESO is procuring over 2.5 GW of new capacity to meet provincial system needs through the Long-Term 1 RFP (LT1); however, the LT1 procurement design includes no locational incentives for the Central-West area. The IESO claims "Developing an integrated plan that incorporates IESO transmission planning assessments into the APO process, while providing clarity around how generation vs. transmission decisions are made" but it is not clear to ESC how the scope of work and the LT1 RFP process are integrated. In ESC's view the two processes are silos that are disjointed and risk inefficient investment planning. Second, as a unique asset that can provide transmission services ESC is disappointed that energy storage resource capabilities are not discussed in the scope of work or recommendations. Energy storage resources can help delay decisions on long-term, large land impact, multi-generational ratepayer funded investments (e.g., new transmission lines and rights-of-way) until more certainty on system needs can be determined. Without a clear commitment to exploring energy storage resources as a transmission solution the IESO bulk planning process will not achieve efficient decision making that incorporates traditional and innovative solutions. Third, and related, ESC is concerned at the lack of engagement plans with supply resource developers including generation and energy storage resources. The IESO is the system operator and central planner with significant experience operating and assessing the needs of the power system. The IESO does not have experience or direct access to commercial development options, costs, timelines or capabilities. The IESO must establish a process for drawing critical information on generation and storage solutions for the bulk system study to be successful. ESC has long advocated for a technical working group of commercial entities and associations to provide clear advice and insight to the IESO to inform planning decisions. Further, information is best drawn in formal proposal submissions even if those submissions are not binding. To that end, ESC recommends that the IESO explore resource options through a two-stage request for proposal for local/regional/zonal resources. The two stages would start

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	with capability, capacity, and cost of capacity from new, existing or upgraded assets under general commercial terms. This can include existing assets potentially including energy storage resources to increases the deliverability of their assets The IESO should allow flexible term lengths to reflect different capital investment commitments and operating lives of those investments. Next, if IESO assesses that the quantity and price of the information submitted in the first stage warrants investment or further analysis, they can launch a second stage formal procurement with a price cap based on the first stage information submitted. Finally, ESC recommends the IESO explore distributed energy resources and other demand side solutions as part of the bulk planning process. This can include the installation of energy storage resource or other flexible demand capabilities at existing and new load customer to reduce the strain on the bulk transmission system.

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What other potential growth should be considered as we quantify needs in the Central-West area?	Similar to above, the IESO should consider the distributed energy resources and other demand side resources as part of the potential growth assessment. This can provide greater understanding of the capabilities of the new and existing load customers as part of the bulk system assessment.

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What additional information should be taken into account as we develop options?	ESC reiterates the need to integrate resource procurement processes with the bulk planning process. The IESO is adding the largest amount of new supply resources in over a decade and does not seem to have any process to coordinate investment with bulk system needs. Further, the IESO is not exploring options to enhance existing resources through re-powering, upgrades or installation of energy storage resources. Hybrid projects at existing project sites can offer significant value to Ontario ratepayers.

General Comments/Feedback

The IESO states that the formalized bulk planning process included a key enhancement of "providing more planning data". The Central-West Bulk Study Engagement Session has provided no planning data on the current system capabilities and has effectively not provide information for stakeholders to begin constructing their view of the system and potential solutions. As such, future engagement sessions with stakeholders will offer limited value since not enough time will be available for stakeholders to understand the system conditions and assess the appropriateness of solutions proposed by the IESO. To allow stakeholders to better prepare, the following planning information should be published:

- Historic loading information over past 5 years (account for COVID impacts) at each load station or each load pocket (i.e., groupings of 2 to 5 load stations).
- Projection of load in 5-year increments over the planning horizon for each load station or load pocket
- Thermal transfer capability of each transmission circuit under normal operation and contingency situations.
- Interface transfer capability between IESO regional planning zones internal to Central-West bulk study and external zones
- List of all generation resources in the Central-West bulk system including their capacity, seasonal effective capacity and transmission connection point.
- DER and CDM historic and forecast assumptions compiled for all regional planning regions within the Central-West bulk study.
- Procured resources within the Central-West bulk study including their capacity, estimated seasonal effective capacity and transmission connection point.