

Feedback Form

Transmission Planning Bulk Study Updates – Feb 23, 2024

Feedback Provided by:

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Following the February 23, 2024 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 March 8, 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.

Insert Title for Topic 1

Topic	Feedback
What topics would you find most useful to include as part of the Bulk Transmission planning engagements?	Having clarity on the timing impact re short term needs is also important. If there are immediate or short-term requirements, how can we utilize the planned bulk studies to inform decisions that may be required prior to 2025?

Topic	Feedback
Are there other methods of engagement that would support your participation in bulk system plans?	This is a useful engagement. In addition to targeted engagement as needed with affected municipalities and communities, targeted engagement with generators may also be appropriate.

Insert Title for Topic 2

Topic	Feedback
As we integrate the findings of the Central-West bulk study into upcoming broader bulk plans, are there any additional considerations we should be aware of?	

General Comments/Feedback

We want to thank IESO for carrying out this engagement and for laying out the schedule of planning activities. The effort to fulfill the ambitious goals of Powering Ontario's Growth (POG) and its substantial economic benefits will benefit from broad collaboration and coordination across the sector, including developers of generation, transmission, and industrial load / significant industrial projects.

Carrying out the work in a number of discrete bulk studies by region makes sense from a workflow perspective, however we want to emphasize that some bulk transmission infrastructure crosses regions and these are pivot points between regional study areas. We heard this in the webinar, for example, in relation to the Essa transformer station.

Essa and the transmission lines connected to it have multiple sources of likely future requirements. It is a critical path for flow south to the GTA from many areas that are promising for new renewables generation and for potential hydro uprates that may be participating in the LT2 RFP, as well as potential new hydro projects. It is also a location that may be a primary connection point for new nuclear and new pumped storage as outlined in POG. It is also the potential location of significant

new industrial load. Some of these items will be covered in the Southern and Central Ontario Bulk Study, and others in the Northern Ontario System Bulk Study, and coordination between studies will be critical.

There may be other study areas that have a similar dynamic. It would be worthwhile to explore these possibilities.

For project developers of generation it will likely be helpful to have greater clarity on the expected start and end dates of the studies.

We also wish to refer to comments made by APPrO in "EB-2022-0261 - Electricity Transmission Leave to Construct Filing Requirements Update (Draft) – Invitation to Comment" in November 2022.

These comments arose from issues raised in Hydro One's application for leave to reconductor electricity transmission lines in the cities of Toronto and Mississauga (EB-2021-0136).

Specifically, APPrO raised concerns surrounding the IESO's evaluation of transmission alternatives when it prepared its needs assessment in support of the recommended approach to the Trafalgar TS X Richview 230 kV line upgrade.

APPrO noted that "such needs assessments relied upon by applicants in leave to construct (section 92) proceedings must entail a deeper analysis of potential alternatives than that which was filed in EB-2021-0136, in order to satisfy the requirement under the OEB's *Standard Transmission Leave to Construct Issues List* to demonstrate that the subject project is the preferred option."

This issue was largely acknowledged by the proposed section 4.3.2.5 (Analysis of Alternatives) of the Chapter 4 Update, but bears repeating.

For example, the Chapter 4 Update explicitly requires leave to construct applicants to file "evidence on the alternatives to the proposed project" including "the alternative of doing nothing", "non-wires alternatives, including an opportunity for cost-effective generation, energy storage and/or CDM to defer or avoid the wires investment" and "other alternatives (including other wires alternatives) that meet the same needs as the preferred wires option". An applicant must also submit evidence of any "key variations of the proposed project" that are considered, which should include descriptions of "different voltage, conductor size, operation, and tower type".

In APPrO's view, these requirements will assist in ensuring that an appropriate scope of other supply alternatives are considered and deliberated upon in future needs assessments, and help interveners and other stakeholders better understand the "reasoning for why the proposed transmission project was selected [by the applicant] over other wires and non-wires alternatives".

In particular, we noted that "requiring future leave to construct applicants to "compare the various alternatives and options in terms of cost [including level of cost estimate confidence], feasibility, timing, reliability, flexibility (in terms of staging, operability and/or other factors), risk and any other relevant criteria" will provide greater transparency on the depth of analysis and evaluation of alternatives that is conducted by the applicant, and/or the entity that is directing the applicant to develop the proposed, in a supporting needs assessment" would be useful.

While the current study is not concerned with LTCs, APPrO submits that the above comments are important considerations to be kept in mind since inevitably LTCs must be obtained.

Likewise, for example in the IESO's ongoing engagement on a transmitter selection framework, APPrO supports one which considers a competitive process to select transmitters in the future.

Thank you and we look forward to supporting the continued engagement and upcoming studies.