

Feedback Form

Regional Planning Process Review Update – August 25, 2022

Feedback Provided by:

Name: K. Farmer

Title: Senior Regulatory Affairs Advisor

Organization: Electricity Distributors Association

Email: [REDACTED]

Date: September 20, 2022

Following the August 25, 2022 webinar on the Regional Planning Process Review, the Independent Electricity System Operator (IESO) is seeking feedback from participants on the hourly demand profiling methodology, as well as the non-wires alternatives (NWA) options analysis in Integrated Regional Resource Plans (IRRP).

The IESO will work to consider feedback and incorporate comments as appropriate and post responses on the engagement webpage.

The referenced presentation can be found under the August 25, 2022 entry on the [DER Roadmap webpage](#).

Please provide feedback by September 16, 2022 to engagement@ieso.ca. Please use subject: *Feedback: Regional Planning Process Review Update*. To promote transparency, this feedback will be posted on the [DER Roadmap webpage](#) unless otherwise requested by the sender.

Thank you for your time.

Hourly Load Forecasting

Topic	Feedback
What other data or considerations should we include in hourly load profiling?	The EDA has no other considerations to suggest on hourly load profiling.

Non-Wires Options Analysis

Topic	Feedback
Are there any other NWAs or opportunities that should be considered in the IRRP's options analysis? How can the options analysis methodology be improved?	Please see our General Comments below.
Are there operational considerations that should be accounted for when assessing non-wires solution that relies on a dispatch component? For example, does the current storage sizing approach sufficiently account for how it could be operated in today's system? If not, what improvements would be needed?	The EDA has no other operational considerations to suggest that should be accounted for when assessing non-wire solutions that rely on a dispatch component.

General Comments/Feedback

We appreciate the opportunity to provide feedback on the IESO's non-wires alternatives (NWA) options identification and analysis methodology. We propose that the IESO augment its identification methodology by providing a competitive procurement mechanism/process geared to identifying possible NWAs.

As described in the IESO's draft methodology, the IESO will be uniquely responsible for the identification and economic analysis of various solutions (e.g., Distributed Energy Resource, Demand Response, Generation, Storage, Conservation and Demand Management). We propose that the IESO augment its proposed approach with a competitive process (e.g., a request for information) designed to elicit information from NWA service providers, including Local Distribution Companies. We anticipate that using a competitive process will support the IESO in:

- Determining the NWA options that can be made available to meet a defined need
- Obtaining information on the actual level of costs and of qualitative factors

This information could complement the IESO's technical understanding of the available options (e.g., reliability) and enhance its economic/financial analysis (e.g., affordability). If the IESO's analysis shows that an NWA option identified through the competitive process is viable, then the IESO could proceed to issue a request for proposal and solicit firm information from qualified solution providers.

We suggest that the IESO's analysis also address the value of flexibility (e.g., the timeline to deploy NWA option versus traditional transmission infrastructure) and for whether the NWA can mitigate certain risks (e.g., if the NWA option is scalable such that it can be phased and thereby mitigate the risk of uncertain load growth).