

May 28, 2021

Mr. Chuck Farmer

Senior Director, Power System Planning

Independent Electricity System Operator

Toronto, Ontario

Dear Mr. Farmer:

Re: IESO's Gas Plant Phase-Out Impact Assessment

My name is Susan Beharriell, and I am the Chair of an organization named "Climate Action King". We are a group from King Township where the York Energy Centre, the largest gas-fired plant in the province, is located. We are delighted to learn that the IESO has committed to conducting a comprehensive assessment of how Ontario can phase-out its gas-fired power plants.

According to your power point presentation for the IESO's planned May 27, 2021 public engagement webinar, the IESO is planning to evaluate three scenarios.

We are writing to you today to provide you with our initial feedback with respect to your proposed assessment.

Feedback

1. We strongly support the IESO's proposal to assess how Ontario can achieve a complete phaseout of its gas plants by 2030.
2. We request that the IESO assess how Ontario can cap the gas plants' annual GHG pollution at their 2017 level as soon as possible by:
 - increasing our imports of Quebec waterpower using our existing expanded transmission and lines;
 - curtailing gas-fired electricity exports;
 - ramping up the IESO's energy efficiency programs and budgets; and
 - using a competitive process to procure new wind and solar electricity supplies at the lowest possible cost.

3. We request that the IESO assess a supply mix portfolio(s) that includes a balanced combination of energy efficiency and demand response, wind and solar energy, and Quebec renewable electricity and storage resources.
4. Exempting Ontario's gas-fired power companies from carbon taxation on 97% of their pollution is economically irrational, unfair, and politically unsustainable. Therefore, we request that the IESO's analysis of the potential for higher gas prices to reduce the utilization of our gas plants between 2022 and 2030 include scenarios where 100% of the gas plants' greenhouse gas pollution is subject to Canada's scheduled rates of carbon taxation.
5. Finally, 27 Ontario municipalities and over half of Ontario's population, have requested that you reduce gas emissions very soon and then stop them altogether by 2030. Otherwise, Ontario will NOT be able to meet its GHG reduction commitments in time. Climate Action King joins them in the same urgent request.

Conclusion

Thank you for the opportunity to provide you with feedback on your power point presentation in advance of the now-delayed public engagement webinar. We look forward to your reply and your next webinar.

Yours sincerely,

Susan Beharriell

Chair

Climate Action King

King Township, Ontario