Feedback Form

Gas Phase-Out Impact Assessment – May 27, 2021

Feedback Provided by:

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To promote transparency, feedback submitted will be posted on the Gas Phase-Out Impact Assessment webpage unless otherwise requested by the sender.

Please provide feedback by June 17, 2021 to engagement@ieso.ca. Please use subject:

Feedback - Gas Phase-Out Impact Assessment

Questions

Topic	Feedback
Are there additional considerations the IESO has not identified in defining the scope of the assessment to examine the reliability, operability, timing, cost and wholesale market implications of reduced emissions on the electricity system?	Identifying scenarios and options are critical for this assessment rather than simply assessing a case of what happens if Ontario turns off all gas generation. The study needs to be framed around various 2030, 2040 and 2050 scenarios, all with steadily decreasing gas generation and replacement by net-zero technologies, so public and stakeholders can make an informed decision on the future of gas-fired generation and the trade-offs. The replicability and clarity of the study needs to be paramount to ensure that stakeholders have confidence in the findings.

General Comments/Feedback

The federal net-zero 2050 target for Canada must be considered under all future energy analyses. While future provincial targets are still unclear, the move to net zero by 2050 by other levels of government, as well as by the energy industry and other corporate stakeholders, cannot be ignored. As such, any analysis on the future of natural gas-fired generation must be considered within that context and include how Ontario could achieve a net-zero electricity system.

Secondly, the way the research question is phrased -- to study the implications of phasing out gas by 2030 -- will lead to set conclusions that will not allow for a full analysis and discussion of the cost and benefits on the future of natural gas use. Rather than assessing the implications of simply phasing out gas-fired generation, which is unlikely, the research question should be "what would be required to phase out unabated gas-fired generation in Ontario by a.) 2030, b.) 2040, or c.) 2050? And what would the environmental and economic implications be of these three scenarios?" Such an analysis would allow for an informed discussion on the future of gas-fired generation.

And finally, one of the main drawbacks of previous studies has been the closed nature of the modelling, which has made it impossible for stakeholders to assess the appropriateness of the assumptions and how different sensitivities could affect outcomes. As a result, there has been low confidence in the robustness of similar analyses and modelling results in the past. The usual process of releasing a slide deck that simple provides an overview of the results with graphs will not be sufficient in this case. To gain acceptance of the results, stakeholders will need to be able to assess how different scenarios, assumptions and sensitivities could affect the results. Without this, there will be low confidence in any findings and this analysis will not provide the outcomes desired, and this study will be a wasted opportunity. As such, open modelling and a full description of all assumptions needs to be provided.