

# Feedback Form

## Gas Phase-Out Impact Assessment – June 24, 2021

### Feedback Provided by:

Name: Office of Climate Change and Energy Management

Title: n/a

Organization: Region of Peel

Email: [REDACTED]

Date: June 17, 2021

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](mailto:engagement@ieso.ca). Please use subject:

Feedback - Gas Phase-Out Impact Assessment

## General Comments/Feedback

### Consider including the following within the scope of work:

- model electricity sector resources under each scenario
- model demand impacts from decarbonization of the economy
- provide evidence to inform future policy decisions

### Rationale

The Independent Electricity System Operator (IESO) has stated that the current scope of this assessment does not intend to identify a plan for electricity sector resources OR assess demand impacts from decarbonization of the economy. However, the IESO's Annual Planning Outlook evaluates future electricity demand and supply sources, and was the source of information that led to many municipal resolutions, including in the Region of Peel, advocating for a plan to phase out fossil natural gas from electricity generation sources. This was the catalyst for this discussion and therefore, IESO is strongly encouraged to model electricity sector resources and demand impacts from the decarbonization of the economy within the scope of work for this assessment.

Municipalities across Ontario, including the Region of Peel, have declared climate emergencies and have put forward plans on how best to mitigate and adapt to the effects of climate change. These plans call for the electrification of heating and transportation systems. It is important this assessment considers municipal goals to transition to a low carbon economy, through the electrification of heating and transportation system.

The current scope also excludes *recommendations for policy decisions*. Given this limitation it is important that at minimum this work takes into account the policy direction regarding Ontario GHG reduction targets established by sector in the Made-in-Ontario: Environment Plan;<sup>1</sup> IESO is encouraged to review the modelled GHG emissions under each of the evaluated scenarios for this analysis, and provide commentary and evidence to the Province regarding impacts on electricity system GHG emissions versus the Made-in-Ontario: Environment Plan modelling and targets.

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<sup>1</sup> [Preserving and Protecting our Environment for Future Generations: A Made-in-Ontario Environment Plan \(prod-environmental-registry.s3.amazonaws.com\)](https://www.ieso.ca/en/About-IESO/Information-Requests/Environmental-Registry) – Page 24: Planned Emission Reductions in 2030 by Sector

### **Form a stakeholder panel with a diverse set of representatives / experts to:**

- Establish shared outcomes and objectives for assessment
- Provide input and agree on electricity system modelling and cost assumptions
- Establish the evaluation criteria and scoring methodology to classify an electricity generation asset as an “established/existing” technology
- Refine scenario definitions, areas of assessment and targeted outcomes (*GHG reduction targets, cost effectiveness targets, and/or scenario goals based on the outlined areas of assessment*)

Details on stakeholder consultations, deliberations and agreed upon assumptions and methods used to undertake this important work should be shared with the broader public. An inclusive approach to engagement, governance, and oversight, driven through collaboration amongst a diverse set of representatives, should result in greater acceptance by energy, climate change and market stakeholders.

The Region of Peel would be happy to serve as a municipal representative on this panel.

### **Request for clarification**

In scenario 3 on slide 26, what is the emissions reduction via a supply mix approach of new resources in reference to (*the baseline 2016 to 2020 average emissions and/or the annual planning outlook scenarios*)?

Thank you IESO for answering the Regional Municipality of Peel’s call to action and exploring how to phase out fossil natural gas-fired electricity generation while meeting Ontario's electricity needs reliably, competitively, transparently, efficiently and at lowest cost!