

Feedback Form

Gas Phase-Out Impact Assessment – May 27, 2021

Feedback Provided by:

Name: Ronald Macfarlane

Title: Toronto Resident

Organization: Click or tap here to enter text.

Email: Click or tap here to enter text.

Date: 9 June 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. Please use subject:

Feedback - Gas Phase-Out Impact Assessment

NOTE: Please do not include my e-mail on any public posting as it is my personal e-mail.

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?	Click or tap here to enter text.

General Comments/Feedback

This study is an important step forward, and should provide a comprehensive, fact-based and unbiased technical basis for subsequent policy decisions. I am concerned that as currently proposed the assessment seems to be excluding important context. You indicate that the final product will not include: Demand impacts from decarbonization of the economy NOR Consider emission impacts resulting from other jurisdictions (slide 8). Given that electrification is a primary approach to reduce greenhouse gas emissions not taking into account the increasing demand for electricity nor the need for carbon-free electricity is does a disservice to the assessment. Canada must drastically reduce its greenhouse emissions between now and 2030. Increasing emissions in not an acceptable route. As you note (slide 13) many gas generators were developed in lieu of major transmission upgrades. This was rather short-sited, since we have known for a long time that Ontario needed a modernised grid to be able to sustain growth in renewable energy (wind/solar). It was a mistake, and this mistake must be corrected. You further mention (slide 16) that a number of natural gas plants are under contract as a constraint. However, I will note that the government broke contracts for renewable energy producers. You mention (slide 16) that gas generation was heavily relied on in the transition off reliance on coal. However, we know that on a life-cycle basis, because of methane emissions, natural gas is only marginally better than coal. On slide 17 you say "natural gas generation is expected to compete with other resources to meet system needs." Clearly that should not be allowed. All new generation must be low-to-no carbon. Similarly, even though shutting down plants early that have useful life left removes a cost-effective source of capacity, ignoring the cost of climate change to health and the economy must be factored in. Externalities must not be brushed aside – they are a cost burden to society. On slide 19 you mention that "a significantly higher amount of installed generation, and transmission, would be required to obtain the same level of service." My understanding is that the cost of renewable energy is no low enough, that it is cost effective to overbuild renewable energy generation. Investment in the transmission grid must be a priority. The assessment should consider how a gas phase out can contribute to climate action objectives by: (1) reducing the gas plants' GHG emissions immediately to at or below 2017 levels and (2) completing a phase out of all gas-fired power plants by 2030. The assessment should also address the following approaches to replacing existing gas generation capacity: (1) Renewable energy (wind, solar, etc.), (2) Quebec Hydro (in depth engagement with Hydro Quebec on supply and storage) (3) Conservation

and demand management (4) Vehicle-to-grid integration and other emerging storage options, and (5) Curtailing gas fired electricity exports to the U.S.