

# Feedback Form

## Regional Electricity Planning in Kitchener/Waterloo/Cambridge/Guelph Area – December 12, 2024

### Feedback Provided by:

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Date: January 6, 2025

To promote transparency, feedback submitted will be posted on the [Kitchener/Waterloo/Cambridge/Guelph Area](#) webpage unless otherwise requested by the sender.

Following the Kitchener/Waterloo/Cambridge/Guelph electricity planning engagement webinar held on December 12, 2024, the Independent Electricity System Operator (IESO) is seeking your feedback on the draft electricity demand forecast scenarios and the proposed engagement plan. A copy of the presentation as well as a recording of the session can be accessed from the [engagement web page](#).

**Please submit feedback to** [engagement@ieso.ca](mailto:engagement@ieso.ca) by January 8, 2025.

Topic	Feedback
What additional information, if any should be incorporated in the proposed scenarios?	Click or tap here to enter text.
How can the proposed scenarios best capture the range and uncertainty of growth potential while informing near-term infrastructure investments?	Click or tap here to enter text.
What areas of concern or interest about electricity should be considered as part of the planning process?	Enbridge Gas suggests that IESO provides more details on how its planning addresses and ensures system resiliency of the electric grid in the KWCG Region. Enbridge Gas also suggests that details regarding how Conservation and Demand Management (CDM) will be further maximized and forecasted in the electricity planning are provided.
What information is important to provide throughout the engagement? Does the proposed Engagement Plan provide sufficient scope and opportunities for input? What other engagement activities or methods should be considered?	Yes, Enbridge appreciates IESO's on-going efforts to engage with stakeholders in the KWCG Region IRRP process. As noted below, Enbridge Gas respectfully requests to join the KWCG Region IRRP Technical Working Group.

## General Comments/Feedback

**Enbridge Gas recommends that coordinated energy system (gas and electric) planning be completed for the Kitchener Waterloo Cambridge Guelph (KWCG) Region.** Coordinated planning between the electric and gas systems would ensure that the energy transition can occur in a manner that maintains consumer choice and in a manner that is most orderly, cost-effective, and resilient; both in the KWCG Region and more broadly across Ontario. Specifically, energy system operators (IESO and Enbridge Gas), energy transmitters (Hydro One Networks Inc. and Enbridge Gas) and local distribution companies (Alectra Utilities Corporation, Centre Wellington, Enova Power Corp., GrandBridge Energy, Halton Hills Hydro Inc., Hydro One Networks Inc., Milton Hydro, Wellington North and Enbridge Gas) should engage in coordinated system planning activities to achieve the above noted objectives.

For example, Enbridge Gas appreciates the efforts made by the IESO in taking the first step towards more collaborative and coordinated energy planning by including Enbridge Gas as an observer in the Ottawa Region working group and providing an opportunity to participate in discussions on the decarbonization scenarios that are considered in the demand forecast. Additionally, Enbridge had material involvement in the development of the Windsor-Essex IRRP, further emphasizing the importance of collaboration in planning for gas and electricity systems. Collaboration efforts such as these examples enables more strategic and efficient investments to be made, delivering significant benefits to the subject region.

Effective coordination at both the distribution and transmission planning levels is essential to fully utilize existing infrastructure and address the increasing energy demands of the region. This would benefit the residents and businesses in the KWCG Region and Ontario more broadly by optimizing

existing local energy systems (electric and gas), keeping costs down for ratepayers, while also minimizing greenhouse gas (GHG) emissions. For these reasons, **Enbridge Gas respectfully requests to join the KWCG Region IRRP Technical Working Group** to review and determine how best to leverage both local energy systems to meet increasing electricity demand and its pace in the most reliable, resilient and cost-effective manner.

System coordination and energy diversification would also allow for behind-the-meter technologies, like hybrid heating and distributed energy resources (DERs), time to develop and/or be adopted more readily while meeting short-term energy needs and ensuring on-going system reliability and resiliency. Examples like hybrid heating showcase the benefits of a coordinated approach between electric and gas systems on a site-level by allowing either system to operate when it is optimal to do so. Hybrid heating lowers annual GHG emissions while supporting energy demand during peak periods. Customers who operate hybrid heating systems can ensure that their individual site needs and/or requirements are met while also considering operational costs.

**Enbridge Gas suggests that due consideration be given to a diversified energy system approach in the KWCG Region forecasts.** A diversified energy system is one that integrates electric and low-carbon gas solutions and can reduce GHG emissions while also avoiding (or deferring) the build-out of peak electric infrastructure. On an energy system level, further evaluation of how the emitting generation resources can reduce GHG emissions while continuing operations would be invaluable to support peak energy and resiliency needs of KWCG Region.

Furthermore, greater collaboration and information sharing between sectors can help to ensure that the forecasted pace and extent of space heating electrification in buildings in the KWCG Region is based upon observed trends and market insight. It is possible that by coordinated and diversified system planning, greater near-term GHG emissions reductions could be achieved in a more cost-effective and resilient manner, and that further evaluation of this opportunity is warranted.

Enbridge Gas is ready to engage in open discussions with IESO and the KWCG Region IRRP Technical Working Group and is eager to explore a coordinated approach to energy system planning in the KWCG Region. By working together, Enbridge Gas is confident that the end-results would be an enhanced and more robust means for energy system planning and that energy systems remain reliable, resilient, and affordable for the people and businesses in KWCG Region.