

Transmission Losses – Feedback Form

Meeting Date: September 30, 2020

<u>Date Submitted:</u> <i>2020/10/22</i>	<u>Feedback Provided By:</u> Organization: Society of United Professionals Main Contact: Bohdan Dumka Email: [REDACTED]
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Following the September 30, 2020 Transmission Losses webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the following items discussed during the webinar. More information related to these feedback requests can be found in the presentation, which can be accessed from the [engagement web page](#).

Please submit feedback to engagement@ieso.ca by October 22, 2020. If you wish to provide confidential feedback, please submit as a separate document, marked “Confidential”. Otherwise, to promote transparency, feedback that is not marked “Confidential” will be posted on the engagement webpage.

Stakeholder Feedback Table

IESO Requests	Stakeholder Feedback
<p>Are there aspects of the current approach to options development and evaluation that don't sufficiently consider transmission losses? How could these be improved?</p>	<p>In Ontario it would appear that transmission losses are estimated on an ad hoc basis primarily dependant upon engineering judgement. For example slide 22 states that "Typically, a detailed quantification of losses beyond this assessment [by applying engineering principles] is not required as savings are often not a material consideration compared to the overall project costs under evaluation". No quantification is provided on slide 22, or elsewhere in the presentation, as to what is a "material consideration" ie is it a % of project cost, a \$ threshold etc. Consequently stakeholders need to see IESO's and HONI's guidelines for considering losses and evaluating them. This also suggests that IESO and HONI should be required to estimate transmission losses in most if not all assessments of options in order to determine their materiality and relevance in selection of an option. Often times the viability of other options are not properly assessed unless more detailed analysis and consideration is given to them.</p>
<p>Other feedback on how losses are considered in the planning process?</p>	
<p>Is any further information/clarification required on how transmission losses are accounted for in conductor or transformer selection?</p>	<p>In the example provided re: Losses Consideration in Conductor Selection [slides 37-39], the losses are based on 2018 flows and the cost calculated based on the 2018 HOEP. Its not clear as to why a forecast of annual flows as well as the HOEP are not used. This would suggest that this sort of omission may be common in the assessments which are done.</p>
<p>Is the materiality of losses being appropriately balanced against other system costs in the discussed processes?</p>	<p>See above.</p>
<p>Are any clarifications required on any of the discussed processes?</p>	<p>See above.</p>
<p>Are there opportunities to impact losses where Ontario is taking a materially different approach than other jurisdictions?</p>	<p>The comparisons to other jurisdictions do not outline any such opportunities to impact losses. Rather, the focus seems to be to state that Ontario is following current best practices of other jurisdictions and leaving it at that [ref slide 62]. The comparisons need to be redone to focus on any such differences. For example, slides 56 & 57 list 8</p>

	<p>opportunities to impact transmission losses and a comparison of Ontario’s current approach to other jurisdictions for each. This is where the focus should be put on where the roughly 30 different countries included in the comparison do things differently than Ontario. With this large selection of countries it seems incredible that Ontario is doing essentially the same as all of them to minimize transmission losses and there are no new opportunities to explore.</p>
<p>Are their specific aspects of the processes/approach in other jurisdictions that Ontario should emulate?</p>	<p>On slide 59 it is stated that “Regulation related to transmission losses differs in some jurisdictions (UK, parts of Europe), some with different incentives in place”. There is absolutely no indication as to what these different incentives are, nevermind an assessment of their impact upon minimizing transmission losses and how they might be useful in Ontario.</p>
<p>Are there additional measures to reduce losses, related to the planning process or equipment standards, beyond what was discussed on September 30, that we can explore the potential benefits of as part of this engagement?</p>	