

Feedback Form

Transmitter Selection Framework: Focused Engagement Session #2 – Mar 27, 2024

Feedback Provided by:

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Following the March 27, 2024 engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the items discussed during the webinar. The webinar presentation and recording can be accessed from the [engagement web page](#).

Please submit feedback to engagement@ieso.ca by April 19, 2024. 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.

Topic	Feedback
<ul style="list-style-type: none"> Do you have feedback on the IESO’s Bulk Transmission System Planning process, e.g., in terms of opportunities to be informed or to participate in the development of plans or plan alternatives, and/or in terms of the scope and detail of transmission recommendations? 	<ul style="list-style-type: none"> IESO’s transmission planning processes require early and direct Indigenous participation. The planning process should also consider if further consultation is needed, and the associated impact on timelines. The IESO should clarify how a system need is established (criteria) and how that need is broadly communicated to participants.

Topic	Feedback
<ul style="list-style-type: none"> Do you have feedback regarding the proposed TSF eligibility considerations? <p>Specifically, as it pertains to:</p> <ul style="list-style-type: none"> New Facilities vs. Upgrades: New facilities would be eligible <p>Network vs. Connection Facilities:</p> <ul style="list-style-type: none"> Facilities that benefit all electricity ratepayers would be eligible <p>Estimated Facility Cost:</p> <ul style="list-style-type: none"> Facilities with an estimated cost of \$100M or greater would be eligible for competitive procurement <p>Facility Size:</p> <ul style="list-style-type: none"> Facilities at a nominal voltage of 200 kV and greater would be eligible <p>Timing and System Reliability Need:</p> <ul style="list-style-type: none"> The minimum lead-time for a reliability-driven facility would be 6 years to the recommended in-service date 	<ul style="list-style-type: none"> Hydro One supports all of the proposed eligibility attributes in the initial Transmitter Selection Framework (TSF) design, except for the minimum threshold amount for estimated facility costs. Hydro One also supports the principle that TSF should not be applied to the expansion of existing infrastructure owned by current transmitters and keeping “in flight” transmission projects out of TSF process. We agree with the concept of a minimum threshold amount as the facility cost amount should generate sufficient market interest but should also consider the administrative costs of proponents to bid. Bid costs can be significant, and we believe the minimum threshold should be higher to allow proponents sufficient headroom to save costs. There should be consideration given where project estimates are less than \$100 million, but subsequently due to cost, scope, timing changes, the project cost exceeds \$100 million. How do these changes impact the TSF process? Given how heavily integrated Ontario’s grid model is amongst various actors (i.e. local transmitters, LDCs, and other market participants), increasing the number of proponent interactions into the system can add burden and delay delivery of transmission solutions. Allowing incumbent transmitters to participate in TSF is essential to alleviate this burden.

Topic	Feedback
<ul style="list-style-type: none"> Are there additional eligibility considerations not captured in the initial considerations that the IESO should consider? 	<ul style="list-style-type: none"> Beneficial to distinguish between transmission lines vs. station work; consider excluding network stations that have multiple incoming lines. Need to consider construction, operation, and maintenance standards – IESO needs to have necessary resources to approve line standards, and the transmission developer needs to have the resources to maintain and operate the line(s) they build. Maintain existing right-of-ways (ROW) and provide new ROWs for new lines to minimize coordination friction and maintenance challenges.

Topic	Feedback
<ul style="list-style-type: none"> From the perspective of Indigenous communities and stakeholders, how can the IESO better enable you to effectively participate in IESO transmission planning process? 	<ul style="list-style-type: none"> No comment.

Topic	Feedback
<ul style="list-style-type: none"> Do you have any suggestions for future topics for Focused Engagement Sessions or one-on-one discussions? 	<ul style="list-style-type: none"> No comment

General Comments/Feedback

We are supportive of a process that is well defined, with clear scope and trigger, integrated with existing work and infrastructure, and managed in conjunction with planned outages. This will serve to maximize deliverability and efficiency, while keeping cost and impact low. We continue to believe that for the procurement process to be fair and transparent, incumbent transmitters should not be excluded from the Transmitter Section Framework process. What is also needed are clear rules on maintaining level of service and ability to financially support current and future needs, including operations, storm restoration, connections, upgrades and unexpected changes.