

Feedback Form

Transmitter Selection Framework – June 19, 2024

Feedback Provided by:

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Following the June 19, 2024 Transmitter Selection Framework (TSF) focused engagement session, 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 **July 5, 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
<p>Feedback on Transmission Planning Engagement Roadmap:</p> <p>Do you have feedback on the IESO’s transmission planning engagement roadmap, including opportunities to be informed or to participate in the development of transmission plans?</p> <p>Slide Reference: 16-22</p>	<p>See General Comments.</p>
<p>Sufficiency of Bi-Annual Updates:</p> <p>Are bi-annual updates on TSF-related transmission studies and projects sufficient to provide Indigenous communities and transmission developers with adequate lead time to mobilize resources and actively participate in the transmission planning process?</p>	<p>See General Comments.</p>
<p>Effective Performance and Functional Requirements from Other Jurisdictions:</p> <p>From the perspective of developers, is there a level of specification regarding transmission performance and/or functional requirements that have worked well in other jurisdictions?</p> <p>Slide Reference: 27</p>	<p>See General Comments.</p>
<p>Evaluating Technical Considerations within Transmission Proposals:</p> <p>The IESO is seeking developer input on other technical evaluation considerations used in other jurisdictions that should be considered within project evaluation for TSF.</p> <p>Slide Reference: 28</p>	<p>See General Comments.</p>

Topic	Feedback
<p>Improving Developer Participation:</p> <p>How can the IESO better enable developers and transmitters to participate in the development of alternative solutions during the Bulk Study Planning Process? For example, what information (general or specific) do developers need to adequately bring a solution idea or proposal forward for the IESO’s consideration in the development of a system plan?</p>	<p>See General Comments.</p>
<p>Indigenous Participation and Support Programs:</p> <p>For Indigenous participation in transmission planning, is the Indigenous Energy Support Program helpful in addressing capacity barriers to participating in IESO transmission planning processes? Is additional support needed?</p>	<p>See General Comments</p>

General Comments/Feedback

My comments are not specific to the questions posed following the June 19 webinar. They are targeted toward the notion of a Transmitter Selection Framework generally. I recognize that these comments may have been better submitted in response to earlier stakeholder sessions in this engagement – such as the March 27 2024 presentation. However, a lot has changed recently – in Ontario and across Canada – creating a new set of considerations in which to consider a Transmitter Selection Framework.

To set context for these comments, consider the following:

- Transmission capacity in Ontario to connect new generation, load and storage devices is very limited. The IESO has just completed several procurements including the E-LT and LT1 RFPs which are bringing on substantial quantities of supply resources and consuming much of the spare connection capability in the province. In addition, Ontario’s mostly clean grid is attracting substantial new load and seeing existing industrial processes transform to use increased quantities of electricity. In addition, the IESO has signalled acquiring about 5000MW of new energy-producing resources in LT2-4 RFPs. The IESO’s Connection Guidance Document for the anticipated LT-2 procurement further indicates the limited connection

capability in Ontario. According to the IESO, the first of these procurements needs to deliver about 5TWh of energy by the end of this decade.

- The IESO has further signalled the potential of further increasing the near term demand forecast to reflect additional load that seeks to connect in Ontario – including EV plants and data centres. This will further drive a need for new supply resources – and the transmission capability to connect them.
- As new generation, load and storage devices seek to connect, there are important processes to evaluate the impacts of these connections – executed by both the IESO and the relevant transmitter. These processes require close coordination between the two parties and the proponent. Across North America, jurisdictions are struggling with assessing impacts of increasing quantities of new connections as their electricity systems transform. Adding new transmitters into the mix must be done extremely carefully so that connection requirements remain clear and consistent, coordination between the IESO and transmitters remains tight, and connection assessments can be completed in a timely manner.

In general, it takes about 7 years to build new transmission in Ontario – from project development thru to construction and permitting. Activities on the front end to develop transmission plans and select a transmitter add to this timeline. While I recognize that the IESO is responding to a request of the Minister of Energy to develop a Transmitter Selection Framework – and I understand the valid goals of seeking greater value for Ontarians through competitive procurements – I am concerned that the additional time associated with transmitter selection will hinder Ontario economic development and resource adequacy.

Ontario electricity planning processes – for both bulk and regional assessments – have been developed and executed successfully in past years. However, these processes are most effective when the Ontario electricity system is undergoing incremental, evolutionary change. The IESO's planning processes make clear that we're heading into a period of significant growth. Therefore, a different approach for transmission planning may be needed that aligns with the anticipate high growth in electricity demand and associated supply resources.