

Feedback Form

Transmitter Selection Framework – January 22, 2025

Feedback Provided by:

Name: Jacob Godfrey

Title: Project Coordinator

Organization: Essex Power Corporation

Email: [REDACTED]

Date: February 12, 2025

Following the INSERT DATE 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 February 12, 2025. 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.

Insert Title for Topic 1

Topic	Feedback
In your view, does the proposed "Qualified Transmitter Registry" sufficiently:	
1. Capture all the necessary QTR design categories and proposed evaluation criteria	The Qualified Transmitter Registry captures the core categories in experience, technical, financial, and regulatory requirements for transmitters; however it has gaps that may limit competition by exclusion of new entrants. Gaps explored below.
2. Provide opportunities for qualified transmitters and developers to participate	No. Prescriptive and strict experience and financial requirements favour the large incumbent and limits access to new or smaller proponents. Rigid project experience criteria ($\geq 200\text{kV}$, $\geq 50\text{km}$) along with the proposed requirement for minimum staffing/executive experience create significant barriers to transmitters other than the incumbent. For instance, new joint venture partnerships with Indigenous Groups will be precluded by not having the proposed minimum requisite experience.
3. Promote competition	<p>No. The proposed eligibility requirements and financial barriers will limit competition and grant unfair advantages to the large existing transmitter.</p> <p>The requirement for proponents to have developed two transmission projects exceeding 200 kV over 50 km in the past fifteen years, along with the obligation to have operated and maintained two such projects for at least five years post energization, effectively excludes newer entrants that may not yet have completed projects of the defined scale.</p> <p>Additionally, corporate structures involving Indigenous partnerships may not align with the rigid criteria, further limiting participation. Given the existing landscape of transmission providers in Ontario, the proposed thresholds risk reducing the number of qualified proponents to the incumbent transmitter and restricting diversity in transmission solutions. The current QTR does not offer alternative pathways for new entrants, discouraging broader participation and innovation due to unnecessarily restrictive experience requirements.</p>

1. Capture all the necessary QTR design categories and proposed evaluation criteria	The Qualified Transmitter Registry captures the core categories in experience, technical, financial, and regulatory requirements for transmitters; however it has gaps that may limit competition by exclusion of new entrants. Gaps explored below.
4. Define project experience, financial, technical, and O&M criteria clearly	Yes. However some requirements may be too rigid and limit participation from non-incumbent transmitters.
5. Meet transmitter needs and encourage broader participation with the open submission window	Yes. The submission window provides much-needed flexibility for applicants.

General Comments/Feedback

To ensure that the QTR fosters true competition, the IESO should consider adjustments to reduce barriers for other current Ontario transmitters, while maintaining the necessary standards for reliability and project success. 1. Adjust experience requirements (related or cumulative experience of principals/partners, joint ventures), 2. Tiered financial requirement approach (demonstrate secured third-party funding) to allow for joint ventures with local partners, 3. Current Ontario licensed Transmitters should be qualified as they have already met the OEB’s criteria.

Additionally, the template form for feedback needs to be revised to remedy the various formatting issues in the table. For example, the duplication of question 1 on each page the table extends to.