

# Feedback Form

## Transmitter Selection Framework – January 22, 2025

### Feedback Provided by:

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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](mailto: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 evaluation of applicants and their relevant experience can significantly be improved by recognizing the unique nature of decentralized corporate structures. Many companies involved in transmission projects operate as new partnerships or as part of a larger corporate group. For instance, FortisOntario is a wholly owned subsidiary of Fortis Inc. ("Fortis"), a North American leader in the electricity and natural gas sector, with \$70 billion in assets and ten regulated utilities in Canada, the U.S., and the Caribbean. This includes ITC, the largest independent transmission company in the U.S., which owns and operates high-voltage transmission assets with a combined peak load exceeding 22,102 MWs across approximately 26,100 kms of transmission lines.

Under the Fortis operating model, all affiliates benefit from the parent company's strategic support, governance expertise, access to capital, and valuable relationships with Fortis utilities across North America who share insights and leading practices. This unique approach supports best-in-class customer affordability and resiliency, the safety of our employees, and the highest levels of corporate governance. The proposed QTR framework should not disregard the collective strength and proven capability of corporate groups. The QTR framework must recognize decentralized corporate structures as a qualified transmitter. Failing to do so would limit Ontario's access to proven, capable transmitters, ultimately hindering the industry in Ontario and failing to deliver the best outcomes for customers.

Furthermore, the QTR framework currently limits the ability of Indigenous communities to form partnerships with qualified transmitters when seeking to own a stake in a newly established transmission company at the beginning of the project. Under the current framework, these partnerships would need to undergo the same QTR process as any other partnership. However, the QTR framework could be improved to allow First Nations communities to directly partner with a qualified transmitter and submit a bid for the project without requiring the new partnership to go through the full QTR process. This change would better support Indigenous involvement from the outset of the project and help

	<p>ensure that First Nations have early and direct participation in transmission development projects.</p> <p>In addition, the proposed QTR framework could include experience in Ontario as a key evaluation criterion (e.g., past projects, operating regulated companies, licensed transmitters). Companies with an established presence in Ontario bring valuable local knowledge, regulatory expertise, and strong networks, which enable faster and more efficient project execution. This experience would help deliver successful, cost-effective projects that benefit ratepayers and all Ontarians.</p>
<p><b>2. Provide opportunities for qualified transmitters and developers to participate</b></p>	<p>As described above, the QTR framework could benefit from greater flexibility in evaluating decentralized corporate structures and their collective experience. A narrow focus on individual entities and their past transmission work may fail to capture the broader capabilities of a corporate group. By considering the combined experience and strengths of the group as a whole, rather than limiting evaluation to a single entity's history, the QTR framework could more effectively recognize the full potential and expertise of decentralized companies.</p>

<p><b>3. Promote competition</b></p>	<p>Broadening the TSF eligibility criteria could enhance competition and deliver greater value while supporting the growth of local transmission companies in Ontario. By expanding the pool of projects eligible for competitive bidding, the QTR framework could create more opportunities for qualified transmitters to compete. For example, lowering the cost threshold to below \$100 million, including 115 kV projects, and allowing projects with a lead time of less than six-years would increase competition and open up more bidding opportunities.</p> <p>Additionally, establishing a separate pool for smaller transmission projects aimed specifically at existing Ontario-based transmitters would not only promote competition but also allow local companies to gain the experience and expertise to grow into larger and more experienced entities capable to bid on potentially larger projects. These adjustments would support a more dynamic and competitive transmission sector, ultimately benefiting Ontario's economy and energy infrastructure.</p>
<p><b>4. Define project experience, financial, technical, and O&amp;M criteria clearly</b></p>	<p>See response #1.</p> <p>Additionally, while we recognize that IESO plans to collaborate with OEB staff to explore how the QTR process can streamline the OEB transmitter licensing process (and whether the TSF can serve as an alternative method for OEB licensing), it would also be valuable to consider the reverse: how being a licensed transmitter in Ontario could help streamline the QTR process. It could limit participation and be counterproductive if an entity already licensed in Ontario is considered unqualified because of a technical category also included in the licensing application requirement, or it may create unnecessary barriers for operating licensed transmitters that have already established it has met such requirements.</p>
<p><b>5. Meet transmitter needs and encourage broader participation with the open submission window</b></p>	<p>An open submission window, coupled with our recommendations above will enhance the efficiency and fairness of the TSF. By adopting a holistic view of applicants and their experience, it can promote a more competitive landscape, drive innovation, and attract higher-quality bids. This approach will not only improve</p>

project execution but also create valuable opportunities for transmitters to showcase their unique strengths in a competitive market.

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## General Comments/Feedback

By way of background, FortisOntario Inc. ("FortisOntario") is a wholly owned subsidiary of Fortis Inc. ("Fortis"). Fortis is a North American leader in the electricity and natural gas sector, with \$70 billion in assets and ten regulated utilities in Canada, the United States, and the Caribbean. Fortis is a proud Canadian company listed on the Toronto and New York Stock Exchanges and headquartered in St. John's, Newfoundland, and Labrador. Fortis has operated in Ontario for nearly 30 years and manages \$2.5 billion in assets in the Province. We recently completed the 1,800 km Wataynikaneyap Power Transmission Project in Northwestern Ontario in partnership with 24 First Nations, the largest First Nations-led grid connection project in Ontario's history. FortisOntario also owns and operates Canadian Niagara Power Inc./Eastern Ontario Power, Cornwall Street Railway Light & Power Company Limited, and Algoma Power Inc. FortisOntario is dedicated to its role in Ontario and is well-positioned to help meet Ontario's growing energy needs. Given our background and experience in the industry, we are pleased to share our insight with IESO and believe we should be recognized as a qualified transmitter under the QTR framework. The TSF is a promising step forward, and with our recommendations, it can be further enhanced to help build a more reliable, efficient, and sustainable electricity system for Ontario's future.