

Feedback Form

Transmitter Selection Framework – January 22, 2025

Feedback Provided by:

Name: Carl A. Huslig

Title: President and Owner

Organization: Grid Reliability Consulting, LLC

Email: [REDACTED]

Date: February 11, 2025

Following the January 22, 2025, 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
<p>In your view, does the proposed "Qualified Transmitter Registry" sufficiently:</p>	
<p>1. Capture all the necessary QTR design categories and proposed evaluation criteria</p>	<p>Grid Reliability Consulting ("GRC") agrees that the IESO has properly captured all the necessary QTR design categories. When it comes to the evaluation criteria, the IESO may want to consider some version of IESO participation criteria that indicates "skin in the game" for projects and not just "gold diggers" looking for investment.</p>
<p>2. Provide opportunities for qualified transmitters and developers to participate</p>	<p>GRC believes that most qualified transmitters and developers will seek partnerships or joint ventures. If one party has the "Qualified Project" experience, then it should be sufficient for the Transmission Developer to meet the qualifications.</p>
<p>3. Promote competition</p>	<p>GRC will repeat its concern with the 6-year criteria for a project to be subject to competition. Our experience would suggest that these criteria be more like 3- or 4-year criteria. As currently accomplished, GRC does not see many projects being competitive.</p>
<p>4. Define project experience, financial, technical, and O&M criteria clearly</p>	<p>Similar to #2, new partnerships or joint ventures would likely not meet the \$200M tangible worth. However, it is very likely that one of the parties in such would meet that threshold. Similarly, the proposed "qualified transmitter" should meet the threshold if one party in the team does. In addition, the requirements for the five Designated Team Members should be clarified to ensure that this criteria applies to the management team and not the board of directors. Finally, GRC believes that the OEB Transmission license is not a pre-requisite for a Qualified Transmitter to submit a RFP response, but would be required if chosen.</p>

<p>1. Capture all the necessary QTR design categories and proposed evaluation criteria</p>	<p>Grid Reliability Consulting (“GRC”) agrees that the IESO has properly captured all the necessary QTR design categories. When it comes to the evaluation criteria, the IESO may want to consider some version of IESO participation criteria that indicates “skin in the game” for projects and not just “gold diggers” looking for investment.</p>
<p>5. Meet transmitter needs and encourage broader participation with the open submission window</p>	<p>GRC believes if the above questions or concerns are addressed, then the answer to this request is YES.</p>

General Comments/Feedback

Grid Reliability appreciates the IESO on leading this process. We have participated in every webinar and appreciated the IESO’s staff approach to stakeholder engagement. Although we may not agree with every point in the proposal, we agree that stakeholders such as us were given ample opportunities to participate and provide input into the process.