

# Feedback Form

## Transmitter Selection Framework – January 22, 2025

### Feedback Provided by:

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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

<p><b>In your view, does the proposed "Qualified Transmitter Registry" sufficiently:</b></p>	
<p><b>1. Capture all the necessary QTR design categories and proposed evaluation criteria</b></p>	<p>Invenergy supports the IESO's goal of ensuring they are procuring high quality projects and executed with developers' best practices. Invenergy's developer expertise goes unmatched, we have developed generation interconnections in North America and have been chosen as the transmitter on several projects to build transmission lines within and across States. Invenergy has a long history of pivoting to meet market need and often that includes developing in new contexts, with various project sizes and capabilities. Qualifications should not be so narrow that proponents are required to have built the exact same project before. This limits the IESO's ability to procure anything unique or any new technologies. Invenergy's expertise speak for themselves; we have successfully been contracted and built a portfolio of different energy technologies and will continue to advance our expertise. Other jurisdictions have shown their trust in our ability to get projects done by contracting Invenergy to build regional and cross border transmission lines. And we hope for the same opportunity in Ontario. We encourage the IESO to look at other markets' transmission qualification processes including MISO, where we are qualified transmitters. To become qualified in the MISO market you can prove your ability to build a transmission project with a detailed plan addressing multiple aspects of operations like acquiring parts, emergency preparedness plans and other details that only a company capable of developing a transmission line could put together.</p>
<p><b>2. Provide opportunities for qualified transmitters and developers to participate</b></p>	<p>The narrow qualification requirements will limit competition and Ontario's ability to see new transmitters in the province. We appreciate the IESO's intention to have developers demonstrate they have experience as transmitters although the 50km threshold for fully constructed projects could unnecessarily disqualify expert transmitters we suggest a 30km threshold. Our generation interconnect projects have proven our ability to build, and our proven development history exemplifies our ability to scale up. The IESO should also consider broadening the evidence for credit worthiness to include other proof of financial capacity.</p>
<p><b>3. Promote competition</b></p>	<p>The IESO's proposed qualifications have a narrow view based on development in Ontario and encouraging legacy transmitters. Other jurisdictions have proposed an approach to transmission procurement that allows greater competition and the IESO may lose projects to those jurisdictions because of lack of alignment with other procurements.</p>

<p><b>4. Define project experience, financial, technical, and O&amp;M criteria clearly</b></p>	<p>As stated earlier the IESO should broaden operating project size requirement and accept different proofs of financial capability, the credit rating requirement excludes any privately held companies. MISO, for example, allows multiple options to prove one is a qualified developer either through experience on project of the same size or technology or based on similar project experience on can prove they can fulfill all aspects of project development with their company expertise. MISO also considers audited financial statements to prove their financial capability.</p>
<p><b>5. Meet transmitter needs and encourage broader participation with the open submission window</b></p>	<p>We support the open submission window as it allows more participants to seek qualification in the process.</p>

**General Comments/Feedback**

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