

Feedback Form

Transmitter Selection Framework – January 22, 2025

Feedback Provided by:

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Date: February 11, 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
<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>The QTR effectively captures the core categories (experience, technical, financial, and regulatory requirements) but has gaps that may exclude new entrants and thereby limit competition (see below).</p>
<p>2. Provide opportunities for qualified transmitters and developers to participate</p>	<p>No, it does not. Strict experience and financial requirements favor the large incumbent, limiting access for new and smaller developers. The 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 other transmitters than the incumbent. Partnerships with Indigenous communities will require new joint ventures which won't have the requisite minimum experience.</p>
<p>3. Promote competition</p>	<p>No, it does not. Stringent eligibility requirements, financial barriers, and unfair advantages of the large existing transmitter will limit competition. The experience requirements, including the requirement to have developed two transmission projects over 200kV/50km in the past 15 years and the requirement to have operated and maintained two qualifying projects for five years post-energization disqualifies newer entrants that may not have projects of this scale but could still deliver cost-effective, timely solutions. The corporate structure of new projects with Indigenous partners may not allow them to qualify. Of the existing transmitters in Ontario, the criteria will limit the number who can qualify under the QTR to the one incumbent. This will only limit the diversity of much-needed transmission solutions. The QTR does not offer alternative pathways, thereby discouraging emerging players from applying due to rigid thresholds.</p>

<p>1. Capture all the necessary QTR design categories and proposed evaluation criteria</p>	<p>The QTR effectively captures the core categories (experience, technical, financial, and regulatory requirements) but has gaps that may exclude new entrants and thereby limit competition (see below).</p>
<p>4. Define project experience, financial, technical, and O&M criteria clearly</p>	<p>Yes, the Qualified Transmitter Registry (QTR) clearly defines project experience, financial, technical, and operations & maintenance (O&M) criteria. However, some requirements may be too rigid, limiting participation from almost every other Ontario transmitter.</p>
<p>5. Meet transmitter needs and encourage broader participation with the open submission window</p>	<p>Yes, the open submission window provides greater flexibility for applicants.</p>

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.