

Feedback Form

Transmitter Selection Framework – April 22, 2025

Feedback Provided by:

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Date: 5/13/2025

To promote transparency, feedback submitted will be posted on the "[insert engagement webpage](#)" unless otherwise requested by the sender.

Following the April 22, 2025 engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on Transmitter Selection Framework Registry (TSF-R) Design. The webinar presentation and recording can be accessed from the [engagement web page](#).

Please submit feedback to engagement@ieso.ca by **May 13, 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.

In your view, do the draft Registry program rules appropriately balance the need for transmitter qualifications with the goal of encouraging broad participation?

It is unclear to Hydro One that the criteria in the Registry, or the overall TSF process, will truly promote customer value. This is why we have suggested that the registry criteria be further strengthened and aligned with the goals of successful and timely projects. For an effective TSF, proponents should be required to demonstrate established competitive processes in their project delivery, procurement and supply chain practices for large transmission projects, as well as a commitment to Indigenous procurement and partnerships.

A Proven Track Record with Indigenous Communities: Registrants should demonstrate successful Indigenous consultations and/or partnerships on transmission projects in the past 15 years.

Financial Requirements: We recommend the IESO consider stronger financial net worth requirements for eligibility.

Do you have any concerns with the application or renewal process as proposed (e.g., two-year term, renewal triggers, documentation)?

Hydro One is supportive of an alternative application process for existing Ontario transmitters.

Are the proposed provisions regarding Indigenous community participation and exclusivity arrangements sufficiently clear and practical to implement?

The proposed provisions are not sufficiently clear with respect to proposals where the Indigenous community wants to lead development of the project. The provisions seem to exclude Indigenous-led proposals with a chosen operational partner. The IESO needs to clarify that if a Nation makes a bid as a lead proponent, exclusivity with a partner of their choosing is acceptable. Otherwise, Indigenous participation may be inhibited.

Are there any outstanding barriers which could interfere with transmitters participating within the TSF registry?	See comments above on participation on Indigenous-lead projects.
Do you have any additional feedback regarding the TSF of the TSF Registry that the IESO should consider?	The IESO should consider public mandates around domestic sourcing of goods and services from Canadian providers and should state clearly the intended sourcing strategy in this respect.
Do you have any feedback on the TSF Registry registration fee and the rationale behind it?	Hydro One has no comment on the registration fee.

General Comments/Feedback

The IESO should consider the following criteria for the TSF Registry:

- 1. A Proven Track Record with Indigenous Partners:** Hydro One strongly suggests that the IESO incorporate evidence of successful Indigenous consultations and/or partnerships on transmission projects in the past 15 years as part of the Registry requirements. Transmission projects being linear in nature, typically require engagement and consultation with many communities along with the assessment of environmental features that can be extremely varied over the geography traversed. Aligning everyone's needs and minimizing impact can materially change project plans. This experience should be mandatory in the evaluation criteria for QTR Applicants.
- 2. Financial Requirements:** Hydro One suggests increasing the financial capability of the proponent. This requirement will ensure candidates have the financial capacity to complete the project on time with desired outcomes for ratepayers. The current proposal states that the minimum net worth of a proponent must be \$200 million, with the minimum project size for the TSF being \$100 million. Large transmission projects entail significant risk and proponents are often required to adjust to changing circumstances and cost pressures through no fault of their own. Taking on a project that would involve more than half of the net worth of the entire company could create significant risk for Ontario ratepayers if the project is beset with large budget overruns. A net worth of \$500,000 million, approximately five times the minimum value of a project, would provide additional financial protection and coverage for Ontario ratepayers. Hydro One believes that these changes will be beneficial to the process, enabling the successful completion of projects, without there being any financial or workforce related issues or hurdles. These requirements add necessary checks and balances to ensure projects are set up for completion, without adding in unnecessary red tape. We would be

pleased to discuss any of these recommendations and appreciate the opportunity to provide feedback into this process.