Feedback Form

Transmitter Selection Framework – April 22, 2025

Feedback Provided by:

Name: Paul Norris

Title: President

Organization: Ontario Waterpower Association

Email:

Date: May 20, 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 <u>engagement web page</u>.

Please submit feedback to <u>engagement@ieso.ca</u> by **May 21, 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?	
Do you have any concerns with the application or renewal process as proposed (e.g., two-year term, renewal triggers, documentation)?	
Are the proposed provisions regarding Indigenous community participation and exclusivity arrangements sufficiently clear and practical to implement?	
Are there any outstanding barriers which could interfere with transmitters participating within the TSF registry?	
Do you have any additional feedback regarding the TSF of the TSF Registry that the IESO should consider?	
Do you have any feedback on the TSF Registry registration fee and the rational behind it?	

General Comments/Feedback

It remains unclear whether the Transmitter Selection Framework will accelerate much needed enabling transmission. For example, the province recently announced the Ontario government's partnership with Taykwa Tagamou Nation (TTN) and Moose Cree First Nation (MCFN) to expand hydroelectric generation at two sites in the Moose River Basin, with an estimated installed capacity of >400MW. Development timelines are expected to be approximately eight (8) years, meaning that the planning and execution of the required transmission infrastructure should already have begun. It can expected that, as is the case with the hydroelectric opportunity, the Indigenous communities will lead the transmission expansion and/or chose one or more partners.

As noted in the Aprill 22 presentation (slide 6) "the TSF will only be appropriate for **certain** new transmission projects, and the IESO has identified proposed project-eligibility considerations which will help guide TSF project-identification and IESO recommendations for transmission system expansions will identify if transmission projects are suitable for the TSF" At the July 2024 engagement, IESO indicated that "No current in-flight projects will be subject to TSF and In the future, transmission projects recommended through IESO plans will be expected to satisfy the eligibility considerations to be deemed suitable for a TSF; every transmission project has unique attributes that could also impact suitability for a TSF"

While the IESO has made adjustments to the technical aspects of project eligibility based on stakeholder feedback, I remain uncertain about the potential public policy rationale for choosing to advance a transmission project by a mechanism other than the TSF, as may be required. Will this be a decision by the IESO? By government? Are there criteria envisioned?

Thank you for the opportunity to comment.