

Feedback Form

Transmitter Selection Framework – July 25, 2024

Feedback Provided by:

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Following the July 25, 2024 Transmitter Selection Framework (TSF) focused engagement session, 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 **August 9, 2024.** 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.

Topic	Feedback
<p>Partial Contracting Evaluation:</p> <p>In your view, does the proposed "Partial Contracting Approach" sufficiently:</p> <ul style="list-style-type: none"> • Safeguard ratepayers against project risks? • Promote competition? • Promote Indigenous Participation? 	<p>N/A</p>
<p>Qualified Transmitter Registry:</p> <p>Does a flexible application submission window for a qualified transmitter registry meet developers/stakeholders needs?</p>	<p>Grid United welcomes the IESO's proposal of a flexible application submission window that will allow transmitters to apply on a rolling basis.</p> <p>In order to foster competition, we recommend that the qualification criteria do not preclude independent developers from participating. Independent developers often do not hold assets on a long-term basis, or operate them, as a core part of their business.</p> <p>Thus, as already noted in our earlier feedback, we suggest following an approach similar to that of MISO, where the qualification process allows transmitters to demonstrate their capabilities either by listing the assets they own and operate, or by presenting a Business Implementation Plan describing how they would acquire these capabilities.¹</p>
<p>Evaluation Criteria Review:</p> <p>Has the IESO captured all of the necessary evaluation guiding principles and criteria within an expected transmission project proposal?</p>	<p>N/A</p>

¹ Please see MISO, Manual No. 027, Business Practices Manual, Competitive Transmission Process: <https://cdn.misoenergy.org/BPM-027%20Competitive%20Transmission%20Process113808.zip>

Topic	Feedback
<p>Indigenous Participation Criteria:</p> <p>What criteria should be considered to assess a proponent's experience with Indigenous participation and partnerships?</p>	<p>N/A</p>

General Comments/Feedback

Grid United welcomes the IESO's willingness to engage with industry stakeholders for the design of the Transmitter Selection Framework. As a developer of long-distance, interregional transmission lines, we are uniquely placed to understand the challenges facing the industry. Active south of the border in areas controlled by CAISO, ERCOT, SPP, MISO, and ISO-NE, we have firsthand experience of various transmitter selection models. Headquartered in Houston, TX, we recently launched a Canadian subsidiary to pursue opportunities in Canada.

As already noted in our earlier feedback, based on our experience in transmission project development across North America, we believe that RFPs should be complemented by other procurement methods. In particular, Grid United believes that interties -- i.e. interconnections with adjacent jurisdictions -- should be excluded from the TSF process because these projects span the boundaries of two or more jurisdictions. For interties, we recommend that the IESO continues accepting unsolicited project proposals, potentially in collaboration with neighbouring RTOs and/or system operators.