

Feedback Form

Electricity Planning in the West of London Area – November 26, 2020

Feedback Provided by:

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Date: December 17, 2020

Windsor-Essex Integrated Regional Resource Plan Addendum Study

Topic	Feedback
What feedback do you have regarding any of the options proposed?	<p>Growth Estimates: South Essex Fabricating is one of the largest Canadian owned constructors of commercial greenhouses and Nature Fresh Farms is one of the largest independent growers of fresh greenhouse produce in Canada.</p> <p>We agree that growth in south west Ontario occurring at a rapid pace. However, based on our experience and knowledge of the greenhouse industry as both builder and operator, we suspect that IESO's estimates relating to the planned growth are underestimated and that significant pent-up</p>

demand exists. For details on this, see below in Greenhouse Market Data.

For example, as planning for the AgriPark (see below in Greenhouse Market Data) continues, it is anticipated that the needs for the AgriPark alone are in the range of 1,500 to 2,000 MW over the next 10 years.

We understand that the last three times (800MW) Hydro One has added lines or transmission stations the additional power has been fully subscribed by the time the assets were constructed (in the first two cases) and before the shovel was even put in the ground on the third (400MW). Access to utilities, including electricity, is critical for continued growth of this sector.

System Needs:

System upgrades and new infrastructure (poles, wires, generation assets, including non-wire alternatives) are critically important. However, understanding timing and planning horizons married with market needs/demand cannot be overlooked. Wire options also cannot meet the need without significant infrastructure development east of London.

We recommend that non-wire alternatives play a key role as the transmission and distribution enhancements are being developed. Therefore, local generation both in front and behind the meter, energy efficiency, etc. are key. Local businesses, in particular greenhouse operators, are well positioned to self-generate while meeting sustainability objectives.

It is imperative that the IESO establish clear principles and objectives to guide program or procurement design. In particular, we urge IESO to establish net-zero goals.

Ability to Sell Excess Electricity and Support IESO in Meeting Regional Energy Needs:

We believe that power should be generated and sold onto grid, and farmers buy from grid. In order to fully utilize all outputs of electricity generation, the generating project should be located in on or in close proximity to a site. In addition, these assets should be able to participate in market programs such as the capacity market (demand response and other value streams) and the Industrial Conservation Initiative (ICI).

Data Needs to Evaluate Non-Wires Alternatives:

Capacity updates at each transformer station.

Clear understanding on how IESO came to 650 MW of generation.

How did IESO derive the demand forecasts? Can IESO modelling be made available?

What are the key principles that will lead to a decision point as to how the 650 MW could be generated? What are the mechanisms/programs being contemplated to fill the supply/generation gap?

Topic

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What other information should be considered in the continued development of these solutions leading up to the recommendations?

Greenhouse Market Data:

There are approximately 3500 acres of greenhouses in Ontario, growing at an estimated 10% a year (approximately 370 acres added in 2020, with estimates for the next three years of 375, 425 and 450 additional acres respectively). This rapid growth is demand side driven. Increasing demand for greenhouse produce is due in part to the fact that retailers and fast food companies are moving to greenhouse only supply for vegetables due to security of supply – market is stable and growing.

Approximately half of the greenhouses constructed over the last five years have installed grow lights to enable growing as close to year round as the plants will allow.

As a result of this explosive growth, we have developed the concept of an Agripark, to be constructed in Essex County, that will enable growth in a way that allows for optimal and efficient infrastructure development for support, including electricity. With a plan for 2400 acres, the Agripark would double greenhouse capacity in Essex County, which is already home to approximately 80% of the greenhouses in Ontario.

West of London Bulk Study

Topic	Feedback
<p>What feedback do you have regarding any of the options proposed?</p>	<p>We support the West Long Bulk Study. We urge the IESO to make best efforts to expedite this process. As mentioned above, we ask that IESO consider short, medium and long-term needs. In the immediate future while transmission is being reinforced, we consider clean generation (solar, biomass, etc.) and storage development. This should not be a transmission versus generation choice. It needs to be both.</p>

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General Comments/Feedback