Feedback Form

Regional Electricity Planning in East Lake Superior Region – December 18, 2024

Feedback Provided by:

Name: Jennifer Murphy

Title: Manager Energy Transition

Organization: Enbridge Gas Inc.

Email: [redacted]

Date: December 18, 2024

To promote transparency, feedback submitted will be posted on the East Lake Superior engagement webpage unless otherwise requested.

Following the East Lake Superior regional electricity planning webinar held on December 4, 2024, the Independent Electricity System Operator (IESO) is seeking feedback on the draft Scoping Assessment Outcome Report. The draft report and webinar presentation, which provides an overview of these feedback requests, can be accessed from the engagement webpage.

Please submit feedback to engagement@ieso.ca **by December 18, 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
What additional information should be considered as part of the Scoping Assessment?	
What other considerations should be made regarding the areas identified as requiring further study through a regional planning approach based on local developments?	
What other areas or specific considerations should be examined through regional planning?	

General Comments/Feedback

Enbridge Gas advocates for a coordinated approach to energy system planning between the electric and gas sectors to identify the most reliable, resilient and affordable pathway to greenhouse gas (GHG) emissions reductions. A well-rounded and coordinated planning strategy will help optimize the energy systems in the East Lake Superior Region, while also supporting the GHG emission reduction targets and meeting the region's growing energy demands. Coordination should occur at both distribution and transmission system planning levels to fully leverage existing systems. Specifically, energy system operators (IESO and Enbridge Gas), energy transmitters (Hydro One Networks Inc., Hydro One Sault Ste. Marie, PUC Transmission LP and Enbridge Gas) and local distribution companies (Hydro One Distribution, Algoma Power Inc., PUC Distribution and Enbridge Gas) should engage in coordinated system planning activities to achieve the above noted objectives. For example, Enbridge Gas appreciates the efforts made by the IESO in taking the first step towards more collaborative and coordinated energy planning by including Enbridge Gas as an observer in the Ottawa Region working group and providing an opportunity to participate in discussions on the decarbonization scenarios that are considered in the demand forecast. Additionally, Enbridge had material involvement in the development of the Windsor-Essex Integrated Regional Resource Plan (IRRP), further emphasizing the importance of collaboration in planning for gas and electricity systems. Collaboration efforts such as these examples enables more strategic and efficient investments to be made, delivering significant benefits to the subject region. Effective coordination at both the distribution and transmission planning levels is essential to fully utilize existing infrastructure and address the increasing energy demands of the region. This would benefit the residents and businesses in the East Lake Superior Region and Ontario more broadly by optimizing existing local energy systems (electric and gas), keeping costs down for ratepayers, while also minimizing GHG emissions. For these reasons, Enbridge Gas is prepared and would welcome the opportunity to work with IESO and the East Lake Superior Region Technical Working Group (TWG) on its IRRP for the region, and to explore the optimal scenario that leverages the benefits of both energy systems to meet the local energy needs.

In developing the IRRP electricity demand forecast, Enbridge Gas recommends considering a diversified scenario that includes both electric and low-carbon gas (such as renewable natural gas

(RNG) and hydrogen). Examples of electric and gas systems working in a coordinated manner are gas-fired power generation (on a system level) and hybrid heating and combined heat and power (on a site level). With the increased transmission and distribution of RNG and hydrogen in Ontario, GHG reductions can be achieved while maintaining system reliability through the use of gas-fired generation plants to meet peak demands. This approach avoids overbuilding the electricity system to handle peak heat loads in winter, allowing natural gas usage to transition to low and zero carbon fuels over time.

Enbridge Gas believes that Ontario can benefit from a balanced and orderly transition to a low-emission and diversified energy system, incorporating new energy technologies over time. Ontarians expect – and deserve – access to reliable, resilient, and cost-effective energy systems. A collaborative and coordinated approach to energy planning can lead to better investments in both gas and electricity systems, driving optimal solutions for the East Lake Superior Region.