

# Feedback Form

## Regional Electricity Planning in Toronto – April 16, 2024

### Feedback Provided by:

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

Following the Toronto Region electricity planning engagement webinar held on April 16, 2024, the Independent Electricity System Operator (IESO) is seeking feedback on the draft electricity demand forecast scenarios and Engagement Plan. A copy of the presentation as well as a recording of the session can be accessed from the [engagement web page](#).

**Please submit feedback to [engagement@ieso.ca](mailto:engagement@ieso.ca) by May 7, 2024.**

Topic	Feedback
What additional information, if any, should be incorporated in the proposed electricity demand scenarios? What are some of your key developments, projects or initiatives that should be considered in developing an electricity demand forecast for the Toronto region?	Enbridge Gas suggests that a diversified scenario (one that considers wires and pipes) and coordinated energy systems (both at the site and system levels) be considered in the electricity demand scenarios. Further details are provided below.
What local issues and concerns should be considered in the electricity planning?	Enbridge Gas suggests that IESO provides more details on how its planning addresses and ensures system resiliency of the electric grid in the Toronto Region. Enbridge Gas also suggests that details regarding how Conservation and Demand Management (CDM) will be further maximized and forecasted in the electricity planning should be provided.
What information is important to provide to participants throughout this engagement?	From a natural gas system planning perspective, Enbridge Gas suggests that more information be provided about possible future capacity shortfalls resulting from the Clean Electricity Regulation, and if shortfalls are anticipated, how they will be addressed in the Toronto Region.
Does the proposed Engagement Plan provide sufficient scope and opportunities for input?	Yes, Enbridge appreciates IESO's on-going efforts to engage with stakeholders in Toronto IRRP process. As noted below, Enbridge Gas respectfully requests to join the Toronto IRRP working group.

## General Comments/Feedback

**Enbridge Gas recommends that coordinated energy system (gas and electric) planning be completed for the Toronto Region.** Coordinated planning between electric and gas systems ensures that an orderly and cost-effective energy transition can unfold in the Toronto Region and more broadly across Ontario.

Energy system operators (IESO and Enbridge Gas), energy transmitters (Hydro One and Enbridge Gas) and local distribution companies (Toronto Hydro and Enbridge Gas) should be engaged during system planning activities to facilitate and develop a more holistic and comprehensive energy system for an area. This would have benefits (as listed further below) for the residents and businesses in the Toronto Region by optimizing existing infrastructure (electric and gas) to its maximum societal benefit while minimizing capital investments for electric system infrastructure build-out to meet increasing peak heat demands (i.e., keeping costs down for ratepayers) and while also minimizing greenhouse gas (GHG) emissions. For these reasons, **Enbridge Gas respectfully requests to join the Toronto IRRP Working Group** to review and determine how best to leverage both local energy systems to meet increasing electricity demand and its pace in the most reliable, resilient and cost-effective manner.

System coordination and energy diversification would also allow for behind-the-meter technologies, like hybrid heating and distributed energy resources (DERs), time to develop and/or be adopted more readily while meeting short-term energy needs and ensuring on-going system reliability and resiliency. Examples like hybrid heating showcase the benefits of a coordinated approach between electric and gas systems on a site-level by allowing either system to operate when it is optimal to do so. Hybrid heating lowers annual GHG emissions while supporting energy demand during peak periods. Customers who operate hybrid heating systems can ensure that their individual site needs and/or requirements are met while also considering operational costs. By participating in the IRRP Working Group, Enbridge Gas can provide IESO with the assumptions around energy transition and electrification that it uses in its own demand forecasting for the Toronto area to ensure the gas and electric systems are being planned using similar assumptions for energy demand.

**Enbridge Gas suggests that due consideration be given to a diversified energy system approach in the Toronto Region forecasts.** A diversified energy system is one that integrates electric and low-carbon gas solutions and can reduce GHG emissions while also avoiding (or deferring) the build-out of peak electric infrastructure. On an energy system level, further evaluation of how the emitting generation resources (i.e., Portlands Energy Centre [PEC]) can reduce GHG emissions while continuing operations would be invaluable to support peak energy and resiliency needs of the Toronto Region.

Enbridge Gas understands that bulk transmission system planning may not be completed prior to 2035 and that further reliance on emitting generation resources within (i.e., PEC) or near (i.e., York Energy Centre, Goreway Power Station or Halton Hills Generation Station, etc.) the Toronto Region may be required. However, Enbridge Gas also understands that the Clean Electricity Regulation presents uncertainty for the continued reliance on emitting resources beyond 2035. The optimization of current infrastructure (wires and pipes) would allow additional time to further evaluate the future utilization of the existing resource mix in and around the Toronto Region, presenting a benefit to maintaining energy system reliability and resiliency.

The 2024 Annual Planning Outlook (APO) considers the signaled release of the Toronto Green Standard (TGS) V6 in 2028 that mandates new residential and commercial buildings built on or after 2030 to be near net zero. Also as noted in the Toronto Hydro's Toronto IRRP Forecasting Methodology document, there are various scenarios considered related to electrified heating adoption, with only the highest adoption rate achieving 100% by 2040. These considerations highlight the variance of timelines and pace by which energy transition via electrification could unfold in new and existing buildings in the Toronto Region. It is possible that by coordinated and diversified system planning greater near-term GHG emissions reductions can be achieved in a more cost-effective manner, and that further evaluation of this opportunity is warranted.

Enbridge Gas is ready to engage in open discussions with IESO and the Toronto IRRP Working Group and is eager to explore a holistic and coordinated approach to energy system planning in the Toronto Region. By working together, Enbridge Gas is confident that the end-results would be an enhanced and more robust means for energy system planning and that energy systems remain reliable, resilient, and affordable for the people and businesses in the Toronto Region.