

Feedback Form

Regional Electricity Planning in Toronto – April 16, 2024

Feedback Provided by:

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Date: April 22, 2024

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 by May 7, 2024.

Topic	Feedback
<p>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?</p>	<p>The demand forecast provided by Toronto Hydro is a gross forecast that does not include the value of tools available (e.g. DERs, CDM, etc.). It is critical to leverage a net demand forecast with a transparent identification of the tools to be used to manage peak load. Please explicitly state the supply sources over the 20-year period, so the changes over time can be easily shown. For example, IESO indicated in the April 18th webinar the Portlands will be offline before the IRRP term completes. When would this occur and what is the planned replacement? Are other options under consideration (such as storage)?</p>
<p>What local issues and concerns should be considered in the electricity planning?</p>	<p>The IRRP is a 20-year forecast which goes beyond the City of Toronto Net Zero by 2040 timeline. It is critical to explicitly include all elements of the energy transition since that will set a roadmap for stakeholder (i.e. IESO, OEB, Toronto Hydro, City of Toronto, customers, vendors, etc.) coordination over that period. Stakeholders are already taking action and spending funds that will impact demand over the 20-year period. These actions are not currently considered in the regional Planning process, including at the local LDC level. There was unanimous agreement to make these adjustment (e.g. via the OEB/IESO RPPAG reports and recommendations), but those items have not been effectively integrated into the Regional Planning process. The Toronto IRRP is the perfect opportunity to make this happen and Pollution Probe recommends taking every effort for the Toronto IRRP since it will set a template for all those that follow.</p>
<p>What information is important to provide to participants throughout this engagement?</p>	<p>Gross and Net Demand forecast by year over the term and the composition of both. Areas of focus and opportunity by year over the term, including CDM, DERs, enhanced efficiency for major new loads (data centers, subdivisions, etc.)</p>
<p>Does the proposed Engagement Plan provide sufficient scope and opportunities for input?</p>	<p>It is unclear how the IRRP will align with the City of Toronto's Net Zero by 2040 plan. IESO indicated that there is a review underway to identify gaps in the Regional Planning process and recommendations to close the gaps. This should be done transparently in parallel with the Toronto IRRP to ensure issues are corrected real time. The</p>

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	IRRPs should clearly indicate how it aligns with the City's plans

General Comments/Feedback

In the April 16, 2024 Toronto Planning Webinar, IESO indicated that it is just early in the process. This suggests that not much work has been done and that there is large flexibility to modernizing the Regional Planning Process for Toronto. Pollution Probe warns against apathy or under-estimating the level of effort required to ensure that the IRRP 20-year forecast meets the needs of Toronto and aligns with TransformTO and balancing the changes required for the energy transition. The Toronto Regional Planning Process is actual more than half complete already (Needs Assessment and Scoping Assessment). Significant effort will be required in the IRRP process to adjust to modern requirements and avoid defaulting to historical poles and worse solutions. The future is distributed (including at the customer site) and the Regional Process need to be adjusted to align. It is also recommended that OEB RPPAG recommendations be implemented into this process. This includes greater transparency, education and analysis to ensure Regional Planning aligns with local community energy planning and TransformTO.