

Feedback Form

Regional Electricity Planning in Toronto – December 5, 2024

Feedback Provided by:

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

Following the Toronto regional planning webinar held on December 5, 2024, the Independent Electricity System Operator (IESO) is seeking feedback on the draft regional electricity needs and the Local Achievable Potential Study. A copy of the presentations as well as recordings of the sessions can be accessed from the [engagement web page](#).

Please submit feedback to engagement@ieso.ca by January 3, 2025.

Regional Planning - Draft Electricity Needs

Topic	Feedback
What feedback do you have regarding the draft electricity needs identified?	<p>A significant number of questions arose on the December 2024 webinar asking for more details on how the forecasts were developed which underpin the needs, echoing the previous submission by Cerebral Energy Advisors regarding lack of transparency on this point. While the IESO has shared what forecast numbers were used, they also said that those number were supplied by Toronto Hydro; the hydro representative could not answer on the webinar how the numbers were generated and suggested that written questions and answers would be best to clarify this. Other questions also arose from BOMA asking if the forecast supplied by hydro to the IESO is the same forecast hydro used in a recent rate case, again a question without a concrete answer.</p> <p>Reiterating our previous submission, the electricity needs are a direct function of the load forecast. Now, further evidence supports that the forecast itself lacks transparency and credibility, meaning that mid to long term needs are not sufficiently supported. Full transparency is required by Toronto Hydro on their forecasting methods before the needs can be established.</p>
What feedback do you have regarding how to meet the electricity needs to inform upcoming milestones?	<p>It was reassuring to see on slide 33 of the latest webinar that options with the lowest net consumer cost are usually selected as the preferred recommendation. A clarification on this point should be made when assessing options for this IRRP; direct costs of ownership and operation should be highlighted and separated from any special government taxes, levies, or subsidies which impact the overall net cost to consumers (e.g. the carbon tax, Ontario Electricity Rebate, Renewable Cost Shift). This will help to ensure an apples-to-apples comparison of options on their objective economic value unbiased by any temporal policy impact.</p>
What additional information should be considered as we screen high-level potential options?	<p>When the federal government proposed Clean Energy Regulations (CER) that aim for a net-zero grid by 2035, the IESO performed a high-level effort and cost assessment which concluded this was infeasible for Ontario on the</p>

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	<p>basis of cost alone, roughly \$35 Billion. This analysis, in cooperation with similar analysis from other provinces, convinced the government to change its target from 2035 to 2050.</p> <p>Similarly, this regional planning process is built upon a municipal government proposing aspirational targets for EV adoption, electrification of heating, net zero and emissions plans, and load growth in specific areas that “have been discussed for years with nothing materializing.... but now we expect massive load growth very soon” according to a participant on the last webinar.</p> <p>The IESO should provide high-level cost estimates for both the reference and high electrification forecasts as a litmus test of the affordability of proposed governmental targets, the same way they did so for the CER 2035 target.</p>
<p>What additional information should be provided in future engagements to help understand perspectives and insights?</p>	<p>Reiterating the point above regarding forecast assumptions driving needs: Toronto Hydro and/or the City of Toronto should be afforded the opportunity to transparently share how the numbers underpinning their assumptions of electrification uptake were established and participants should have the opportunity to ask more questions about the appropriateness of those numbers; it’s readily apparent that some of those numbers were “locked in” before accounting for recent global developments that may have a serious impact on said projections. In the IESO’s response to comments from the first webinar, it was noted that some reports which numbers were based on had new information present and not reflected in the projections.</p> <p>Further to the above point on high-level cost of these projections, since the IESO noted that the investments to support these would be made at the provincial level the IESO (or OEB as noted on slide 8) should provide more information on how the mechanism works to ensure appropriateness of these investments. While Toronto Hydro submits rate cases to recover costs from Toronto ratepayers for Toronto specific investments, what is the forum to ensure that ratepayers in the rest of the province are aware of their new transmission costs as a result of Toronto specific investments based on Toronto Hydro forecasts?</p>

Local Achievable Potential Study (LAPS)

Topic	Feedback
What feedback do you have on the scope that the IESO should consider?	Click or tap here to enter text.
What feedback do you have on the methodology that the IESO should consider?	Click or tap here to enter text.
What feedback do you have on the potential uses for the LAPS that the IESO should consider?	Click or tap here to enter text.
What additional sources or regional policies and trends should be considered?	Click or tap here to enter text.

General Comments/Feedback

Click or tap here to enter text.