

## Transmitter Selection Framework: Focused Engagement Session #2 – Mar 27, 2024

### Feedback Provided by:

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Following the March 27, 2024 engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the items discussed during the webinar. The webinar presentation and recording can be accessed from the [engagement web page](#).

**Please submit feedback to [engagement@ieso.ca](mailto:engagement@ieso.ca) by April 19, 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
<p>Do you have feedback on the IESO’s Bulk Transmission System Planning process, e.g., in terms of opportunities to be informed or to participate in the development of plans or plan alternatives, and/or in terms of the scope and detail of transmission recommendations?</p>	<p>Click or tap here to enter text.</p>

Topic	Feedback
<p>Do you have feedback regarding the proposed TSF eligibility considerations? Specifically, as it pertains to:</p> <p>New Facilities vs. Upgrades: New facilities would be eligible</p> <p>Network vs. Connection Facilities: Facilities that benefit all electricity ratepayers would be eligible</p> <p>Estimated Facility Cost: Facilities with an estimated cost of \$100M or greater would be eligible for competitive procurement</p> <p>Facility Size: Facilities at a nominal voltage of 200 kV and greater would be eligible</p> <p>Timing and System Reliability Need: The minimum lead-time for a reliability-driven facility would be 6 years to the recommended in-service date</p>	<p>Click or tap here to enter text.</p>

Topic	Feedback
Are there additional eligibility considerations not captured in the initial considerations that the IESO should consider?	Click or tap here to enter text.

Topic	Feedback
From the perspective of Indigenous communities and stakeholders, how can the IESO better enable you to effectively participate in IESO transmission planning process?	Click or tap here to enter text.

Topic	Feedback
Do you have any suggestions for future topics for Focused Engagement Sessions or one-on-one discussions?	Click or tap here to enter text.

## General Comments/Feedback

Click or tap here to enter text.

OPG advises incorporating flexibility into transmission planning given the changing nature of demand forecasts, and the IESO’s current transmission planning lifecycle of 4-10 years. A flexible transmission planning structure will be critical for incorporating and adjusting additional information related to transmission needs as the process unfolds.

Opportunities to reduce timelines for critical infrastructure build out should be pursued. Identifying key transmission needs is the first step to ensuring thorough Indigenous and Community engagement and that conversations are guided by principles of reconciliation and partnership. Next steps, including preliminary environmental assessments, design, and stakeholder conversations can follow. The transmission planning process should be fluid, consider supply sites and load growth areas and preserve timelines required for a reliable system.

Ontario needs to move forward with investment in transmission developments as further delays will compromise appropriate environmental assessments and coordination of buildouts that are required to not overload the lines. Transmission should not be the bottleneck for getting supply connected

where it is needed. The TSF should not prevent, block or introduce another barrier, in a location where there is a need for supply.

A competitive selection process could facilitate better, more transparent ratepayer outcomes if the process does not delay any of the critical infrastructure projects. The goal should be to have a robust, reliable, and flexible transmission grid which would be better achieved through a competitive landscape. An example of this is the Watanykaneyap Transmission Project that is led by Indigenous communities. It would be prudent to engage other interested and qualified transmitters in a timely manner to avoid delays.

OPG has had an extensive history of creating true long-lasting partnerships with Indigenous communities. Sufficient time is necessary to build meaningful partnerships and must be considered much in advance of when a project is considered. Some communities are resource constrained and the amount of work to negotiate agreements and partnerships could become burdensome for many of the communities. This can undermine partnerships that are already in progress and could cause further delays in transmission infrastructure.

It is imperative that there is no confusion between ongoing engagement related to current transmission development and the development of the Transmitter Selection Framework.

OPG agrees that the TSF should not be applied to existing infrastructure owned by current transmitters.

More detail should be provided for urgent reliability-driven projects that are not eligible under the TSF. Energy security and reliability are paramount to the transmission infrastructure in Ontario. A clear understanding of which projects are classified as urgent reliability-driven is required.

One important function that the TSF needs to consider is the introduction of a complex patchwork of transmission participants and how the coordination between different transmitter connections will work without sacrificing responsiveness, grid security, creating inefficiencies and transferring cost to the ratepayer.

This framework will also need to consider how the IESO intends to handle the situation of development and in-service delays that could be driven by several factors. Some projects under this framework could fail to reach completion which could increase resource adequacy needs. How would this situation be handled? This would undoubtedly have a trickle-down effect and will impact the connection of new resources if the transmission project is delayed further impacting resource adequacy.

If an appropriate qualified proponent is not found, what steps will the IESO take to ensure that transmission infrastructure is not delayed?