



March 2, 2018

Adam Butterfield  
Independent Electricity System Operator

SUBJECT: Draft Non-Emitting Resources Request for Information

Thank you for the opportunity to provide input to the development of Phase 1 of the Non-Emitting Resources Request for Information. At the outset, it would be very helpful for the IESO to more explicitly outline the objective of the collection and the intended practical application of the information. Will the data be used to support the first incremental capacity auction, currently planned for 2019? Will the information collected support the assessment of options to address the expected shortfall in 2025 due to the retirement of nuclear facilities? Can the IESO provide some sense of the magnitude of expected capacity required in each case? How will the collated information be provided to NERSC to support its report in Q3/Q4 2018? An upfront description in the final document of the rationale for and planned application of the requested data is important to ensuring a transparent and informed process.

In addition, it is unclear whether the RFI is intended to be completed only by market participants or by all generators and proponents. Presumably, if the information collected is intended to help inform approaches to address future capacity, energy, flexibility and other system needs, the IESO would be interested in all sources. In response to this question during the consultation period, the IESO indicated that "the RFI is open to potential new participants who are not market participants if they feel they are underutilized in some way or experience a barrier to participating in the market." As evidenced in the recent IESO/OWA workshop, there is significant uncertainty in the "non-market participant" constituency of the waterpower industry regarding the impacts of and potential opportunities from the Market Renewal initiative. Given that this segment comprises an estimated sixty percent (60%) of two hundred and forty (240) facilities in production or under development with a collective installed capacity of approximately 400MW, much more clarity in this regard is required.

In fact, in various streams of Market Renewal, including at the most recent NERSC session, the OWA has raised the question of baseline data for waterpower in Ontario. We have asked, for example, for the aggregate information regarding:

- Market Participants who are dispatchable, intermittent or self-scheduling
- Embedded generators or generators connected to low voltage who are also market participants
- Stations using compliance aggregation (are these all dispatchable?)
- Stations on a cascade river system

- Stations which are peaking, intermediate or baseload
- River systems with multiple facilities and multiple owners (are these cascading, peaking etc.)

Based on very recent discussions with IESO Sr. Management, it would appear that this information has not been centrally collected. I would propose, therefore, that the OWA and IESO collaborate and use the opportunity presented by this RFI to the above information for waterpower facilities (in addition to the data requested in Appendix A). The current OWA/IESO database has much of the tombstone data (facility name, river system, installed capacity, owner etc.) and could be used as a foundation for this purpose.

Finally, it is unclear how information regarding waterpower projects for which there is no current “proponent” will be collected and included in the analysis. Unlike other technologies, waterpower opportunities “are where they are”, and have been identified through a number of inventories over time. Again, if the intended use of the data gathered is to inform options for future procurement, I would expect that information on “identified waterpower potential” would be of value to the IESO. For example, the OWA and MNRF recently completed an analysis of Ministry dams that could support waterpower projects. The Trent Severn Waterway has undertaken a similar assessment of their structures. In addition, there is more than 100 MW of potential at sites that were previously procured but not commissioned as a result of the lengthy regulatory approvals process. And, as outlined in the LTEP, “Assessments over the years, including the November 2013 Northern Hydro Assessment – Waterpower Potential in the Far North of Ontario, have identified significant remaining waterpower potential in the province.” The OWA strongly recommends that all identified waterpower potential be included in the RFI and would be pleased to work directly with the IESO to ensure the breadth of opportunity in meeting system requirements is incorporated.

Again, thank you for the opportunity to comment.

Sincerely;

A handwritten signature in black ink, appearing to read 'Paul Norris', with a long horizontal flourish extending to the right.

Paul Norris  
President