Feedback Form

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

Feedback Provided by:

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Date: 5.10.2024

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 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
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?	Transmission planning and transmission alternative solution identification can be an excellent value-add for a competitive process. Including well-qualified and sophisticated non-incumbent developers facilitates the introduction of new capabilities and expertise to identify innovative solutions. Indeed, other competitive markets (e.g., MISO, SPP) are leveraging non-incumbent developer expertise and are currently giving those with such expertise additional points in their respective bids. NYISO and PJM also place a very high value on identifying the best alternative transmission solutions. For non-incumbent developers to provide value in alternative transmission solution frameworks, they need ample knowledge of the subject system that can be incorporated into modeling software to run relevant analyses. As IESO considers this aspect, they should consider approaches to sharing planning knowledge and system information to maximize the success of identifying the most efficient, reliable, and cost-effective alternative solutions. PJM's Regional Transmission Expansion Plan process is a good example in this regard. The process transparently allows all developers in PJM to replicate the needs and develop solutions accordingly. In the current state, IESO transmission recommendations are often made public through regional planning reports, and the details around these conceptual or recommended projects are often very high-level. To transition to the TSF, NEET recommends that as much detailed information on transmission line design, capacity, and interconnections be made available to transmitters during the RFP process. For contemplated projects where the in-service date of a project could impact the project's candidacy for TSF eligibility, NEET recommends that the RFP process be initiated as soon as possible to ensure participation by multiple potential transmitters.

Topic	Feedback
Do you have feedback regarding the proposed TSF eligibility considerations? Specifically, as it pertains to: **New Facilities vs. Upgrades:** New facilities would be eligible **Network vs. Connection Facilities:** Facilities that benefit all electricity ratepayers would be eligible **Estimated Facility Cost:** Facilities with an estimated cost of $100M or greater would be eligible for competitive procurement **Facility Size:** Facilities at a nominal voltage of 200 kV and greater would be eligible **Timing and System Reliability Need:** The minimum lead-time for a reliabilitydriven facility would be 6 years to the recommended in-service date	**New Facilities vs. Upgrades:** New facilities would be eligible, with opportunities for prospective transmitters to investigate greenfield replacement alternatives when discussing significant upgrades to new assets. **Network vs. Connection Facilities:** Facilities that benefit all electricity ratepayers would be eligible. **Estimated Facility Cost:** Facilities with an estimated cost of $100MM or greater would be eligible for competitive procurement. NEET understands that there are costs associated with implementing and monitoring an RFP process and agrees with the IESO's position that projects under $100MM are unlikely to realize sufficient benefits to outweigh the costs of a competitive process. **Facility Size:** Facilities at a nominal voltage of 100 kV and greater would be eligible. While initial discussions have entertained a 200kV minimum for TSF eligibility, NEET recommends that 115kV development not be foreclosed during the development of the TSF. The benefit of competition can be realized by electric customers across all new infrastructure, with 115kV being a common nominal voltage within Ontario's electricity grid. While NEET recognizes that most major transmission development may be above 200KV, and recent 115kV projects have predominantly been small scale, the $100MM minimum cost eligibility is sufficient to exclude smaller projects. **Timing and System Reliability Need:** The minimum lead-time for a reliability-driven facility would be 6 years to the recommended in-service date. NEET notes that 2 major transmission projects above $100MM included in the IESO's "Need for Northeast Bulk System Reinforcement" study, which was released in October 2022, were direct assigned to the incumbent transmitter only 12 months later. The proactive identification and communication of future system needs is key to operating a transparent competitive process, where transmitters are provided sufficient time to engage with stakeholders, First Nations, and regulatory agencies to develop an effective RFP response.

Topic	Feedback
Are there additional eligibility considerations not captured in the initial considerations that the IESO should consider?	NEET has nothing further to add at this time.

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?	Because this question is directed at Indigenous communities and stakeholders, NEET is not providing a response.

Topic	Feedback
Do you have any suggestions for future topics for Focused Engagement Sessions or one-on-one discussions?	

General Comments/Feedback

NEET proposes that new, greenfield transmission infrastructure above 100kV and with an estimated cost of $100MM+ be subject to a competitive selection process.

Regarding the refurbishment of end-of-life assets, NEET proposes that competing transmitters could be encouraged to propose alternative solutions to any refurbishment project above 100kV and with an estimated value of $100MM+. Alternatives could include the salvage of the end-of-life (EOL) asset(s) and the greenfield construction of new asset(s) to meet the needs of the IESO.

An example of where this refurbishment approach could prove beneficial is the Gatineau Corridor EOL Study completed by the IESO in 2022, which identified proposed alternatives to the refurbishment of existing incumbent owned infrastructure. These alternatives included new, greenfield transmission line development. NEET has reviewed the study and is currently investigating the proposed alternatives as suggested by the Ministry of Energy.