Feedback Form

Regional Electricity Planning in Burlington to Nanticoke Area – September 11, 2023

Feedback Provided by:

Name: Cara-Lynne Wade

Title: Director, Energy Transition Planning

Organization: Enbridge Gas Inc.

Email: [redacted]

Date: October 2, 2023

Following the Burlington to Nanticoke electricity planning engagement webinar held on September 11, 2023, the Independent Electricity System Operator (IESO) is seeking feedback on the draft electricity demand forecast and Engagement Plans. 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 **October 2, 2023.**

Topic	Feedback
What are some of your key developments, projects, or initiatives that should be considered in developing an electricity demand forecast? What drivers might be considered for the high growth scenario?	Click or tap here to enter text.
What local issues and concerns should be considered in the electricity planning?	Confirmation of how coordination of electric system and gas system planning will be factored into the regional planning efforts. More on this below.

Topic	Feedback
What information is important to provide to participants throughout this engagement?	Click or tap here to enter text.
Does the proposed Engagement Plan provide sufficient scope and opportunities for input?	Enbridge Gas would appreciate the opportunity to be included in the Technical Working Groups for the three sub-regions.

General Comments/Feedback

Enbridge Gas believes that a coordinated approach to energy system planning between the electric and gas sectors will ensure that the most reliable, resilient and cost-effective pathway to emissions reduction is identified. Specifically, a coordinated and holistic approach to planning can ensure that energy systems in the Burlington to Nanticoke area are optimized to support the region in achieving their greenhouse gas (GHG) emission reduction targets while meeting increasing energy needs. Coordination efforts should happen at both the distribution and transmission system planning levels to ensure existing systems are leveraged. Enbridge Gas is prepared and would welcome the opportunity to work with IESO and each core Technical Working Group (TWG) created for the three sub-regions of the Burlington-Nanticoke Region (Hamilton, Brant, and Caledonia-Norfolk) on their Integrated Regional Resource Plans (IRRP), and to explore the optimal scenario that leverages the benefits of both energy systems to meet the local energy needs. This collaborative approach could also include a review of any natural gas IRP plans that may be identified in these areas.

In the development of the IRRP electricity demand forecast, Enbridge Gas suggests that a diversified scenario that includes both electric and low-carbon gas (i.e., renewable natural gas (RNG) and hydrogen) be considered. Good examples of electric and gas systems working in a coordinated manner are gas-fired power generation (on a system level) and hybrid heating (on a site level). With the increase of RNG and hydrogen transmission and distribution in Ontario, GHG reductions will be observed while system reliability is maintained through the use of peaking gas-fired generation plants. This prevents overbuilding the electricity system to meet peak heat loads (including increased agricultural greenhouse needs) in the winter, and natural gas usage can transition to low and zero carbon fuels over time.

The draft Clean Electricity Regulation (CER) was released in August 2023, proposing flexibilities that enable continued provisions for affordable and reliable electricity. The current draft CER is not prescriptive in terms of approach and allows for carbon capture and low-carbon fuels to achieve compliance as energy transition continues to unfold. This optionality would also provide operational flexibility and maintain electricity generation capacity in the area, maintain and/or enhance system reliability and resiliency.

Enbridge Gas acknowledges that the City of Hamilton, the City of Brantford, and the Regional Municipality of Halton have declared climate emergencies and call for cooperation in the reduction of GHG emissions. Enbridge Gas also notes that some of the communities within the Burlington-Nanticoke Region have established energy plans. Enbridge Gas intends to review these plans to

better understand local energy transition initiatives and goals, and to better understand how these elements may be accounted for in our demand forecast and infrastructure planning efforts, where specific actions are well understood, have clear timelines and impacts can be quantified.

Enbridge Gas believes that Ontario can benefit from a balanced and orderly transition to a low emission and diversified energy system, with the incorporation of new energies technologies over time. Ontarians expect – and deserve – access to reliable, resilient, and cost-effective energy systems. A collaborative and coordinated approach to energy planning can result in better investments in both the gas and electricity systems and drive optimal solutions for the Burlington-Nanticoke Region.