

**TransCanada**

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Independent Electricity System Operator  
1600 – 120 Adelaide Street West  
Toronto, Ontario M5H 1T1

Attention: Market Renewal Project Team

RE: Non Emitting Resource Sub-Committee – Comments on Terms of Reference and Work Plan

Dear Mr. Ryan King,

Thank you for the opportunity to provide feedback on the terms of reference and the work plan for the sub-committee. TransCanada Energy Ltd. concurs with some comments raised by other stakeholders at the meeting held on December 7th regarding alternatives to the market renewal. Specifically, long-life and capital intensive strategically important non-emitting resources have historically not significantly been procured through capacity auctions in neighbouring US jurisdictions.

In addition, targeted procurements that more closely match the needs of the power system may yield additional benefits to the system and to ratepayers that are not well matched by market mechanisms.

We respectfully suggest the following underlined additions:

**Section 2.1.1:**

The NER-SC is a stakeholder forum tasked with investigating how non-emitting resources can efficiently participate in the future market contemplated under Market Renewal. NER-SC members will contribute to this work in a number of ways including but not limited to providing information on (i) potential barriers to participation in the Market Renewal new market and possible alternative procurement processes and (ii) the technical capabilities of non-emitting resources. This information will help to ensure non-emitting resources can efficiently participate in the future market and that the electricity sector will be well positioned to deliver on policy goals.

**Section 4.1.1:**

The scope of the sub-committee is to identify how non-emitting resources could participate in the future market or alternative procurement processes, understand their potential effects on market outcomes, as well as considering the various incentive mechanisms available to non-emitting resources in instances of clear policy direction. The underlying need is for the NER-SC to provide information that will help form any design decisions within the Market Renewal initiatives and to consider potential further design enhancements once Market Renewal is implemented.

Sincerely,

Nathan Ford, P. Eng.  
Project Manager, Energy Projects Development

CC: Margaret Kuntz, TransCanada  
John Mikkelsen, TransCanada