

# Feedback Form

## Regional Electricity Planning in the Niagara Area – September 15, 2026

### Feedback Provided by:

Name: Sophie Zhu

Title: Founder & CEO

Organization: Avera Energy Group Inc.

Email: [REDACTED]

Date: October 1, 2026

To promote transparency, feedback submitted will be posted on the Niagara [engagement webpage](#) unless otherwise requested by the sender.

The Independent Electricity System Operator (IESO) is seeking feedback on the scoping assessment report. A copy of the report and a recording of the presentation can be accessed from the [engagement webpage](#).

**Please submit feedback to [engagement@ieso.ca](mailto:engagement@ieso.ca) by **October 5, 2026**.**

| Topic                                                                               | Feedback                                                                                                                                                                                                                                                                                                                           |
|-------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| What additional information should be considered as part of the Scoping Assessment? | Avera requests planning-level locational guidance for battery energy storage systems (BESS), even where precise hosting capacity cannot be published. For Allanburg, Carlton, Vansickle, Bunting, Murray, Vineland, Niagara-on-the-Lake and the D1A/D3A and D9HS/D10S supply paths, please classify each area, where possible, as: |

| Topic                                                                                                                                                       | Feedback                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                             | <ul style="list-style-type: none"> <li>• suitable for load reduction or non-export BESS;</li> <li>• potentially suitable for limited export, subject to study;</li> <li>• potentially constrained for additional export under current conditions;</li> </ul> or <ul style="list-style-type: none"> <li>• dependent on planned station or transmission upgrades.</li> </ul> <p>For each identified need, please also state the principal driver (station capacity, circuit thermal capacity, voltage, protection, short-circuit capability, reverse power flow, restoration capability or a bulk-system interface), the expected need date, season and hours, and the approximate MW and duration that could be useful. This would help distinguish a local reliability opportunity from an area where additional injection could worsen the constraint.</p>                                                                                                                       |
| <p>What additional considerations, informed by local developments, should be taken into account for the areas identified as requiring further analysis?</p> | <p>The IRRP should consider industrial electrification, commercial and tourism loads, fleet and public EV charging, and customer resilience needs when assessing load growth and resource options. These developments may create value for BESS operated behind the meter for peak reduction, managed charging, demand response and backup power, without adding uncontrolled export to a constrained network. Please assess whether non-export or firm limited-export controls could allow customer-sited storage to address needs in the Allanburg–Thorold, Carlton–St. Catharines, Vansickle–Niagara-on-the-Lake and Vineland/Louth areas. Please also identify whether charging outside the local peak would be beneficial or could create a new constraint. The OEB DER hosting-capacity map is useful for initial screening, but it does not replace coordinated planning guidance from the IESO, Hydro One and the affected local distribution companies (LDCs).</p>       |
| <p>What other areas or specific considerations should be examined through regional planning?</p>                                                            | <p>Please examine how the Queenston Flow West (QFW) interface affects the location and operation of storage in Niagara. In particular:</p> <ul style="list-style-type: none"> <li>• Would discharge during local or provincial peak conditions relieve or worsen QFW constraints?</li> <li>• Does the answer depend on location relative to Allanburg TS, Niagara generation facilities or specific transmission circuits?</li> <li>• Could a BESS provide local capacity or reliability value while being restricted from exporting energy outside the region?</li> <li>• Could off-peak charging increase QFW transfer requirements?</li> <li>• What export caps, charging limits or dispatch conditions would be needed to provide net system benefit?</li> </ul> <p>We also recommend a coordinated early-stage screening process among the IESO, Hydro One and LDCs for indicative 4.99 MW, 9.99 MW and 20 MW projects. The process should identify the correct contact,</p> |

| Topic | Feedback                                                                                                                                      |
|-------|-----------------------------------------------------------------------------------------------------------------------------------------------|
|       | preliminary data requirements, relevant constraint owner, and whether non-export or limited-export operation materially improves feasibility. |

## General Comments/Feedback

Averon Energy Group is evaluating behind-the-meter, non-exporting and limited-export BESS opportunities in Niagara. We recognize that final connection capability must be determined through a project-specific assessment by the applicable transmitter or distributor. The requested planning guidance would help developers prioritize projects that address an identified regional need and avoid sites where additional injection is unlikely to be useful or feasible.

Please identify any needs that may become candidates for a future non-wires, demand-response or local-resource procurement, together with the anticipated decision timeline. Averon Energy Group consents to publication of this submission on the IESO Niagara engagement webpage.