Feedback Form

IESO Formalizing the Bulk System Planning Process – February 22, 2021

Feedback Provided by:

Name: Emma Coyle

Title: Director, Regulatory & Environmental Policy

Organization: Capital Power

Email: [redacted]

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Following the February 22, 2021 webinar on the IESO's Bulk System Planning Process, the IESO is seeking feedback from participants on where and in what way stakeholder engagement and participation in the process would be most beneficial, as well as on the type of information coming out of the process that would be most helpful to stakeholders. The IESO will work to consider feedback and incorporate comments as appropriate and post responses on the engagement webpage.

The referenced presentation can be found under the February 22, 2021 entry on the Formalizing the Integrated Bulk System Planning Process webpage.

Please provide feedback by March 15, 2021 to engagement@ieso.ca. Please use subject: *Feedback: Bulk System Planning Process*. To promote transparency, this feedback will be posted on the Formalizing the Integrated Bulk System Planning Process webpage unless otherwise requested by the sender.

Thank you for your time.

Involvement in the process

Topic	Feedback
Where in the process do you feel that you need, or would benefit from, being engaged by the IESO as we carry out planning for the bulk power system?	Capital Power supports the IESO's vision of providing opportunities for stakeholder engagement at every stage of the Bulk System Planning Process ("BSPP").
At the touchpoints identified above, what level of engagement is useful to you (e.g. having the opportunity to be informed, and/or provide input or feedback to the IESO, etc.)?	Similar to previous stakeholder feedback received by the IESO, the BSPP should include: - Regular reporting in accordance with established and consistent timelines - Early notification of system needs - Opportunities for stakeholders to provide feedback on reports (including study scopes), prior to finalization - Coordination with NPCC/NERC requirements and standards - Coordination between the IESO's bulk and regional system plans - Clearly defined processes for linking BSPP outcomes to procurement decisions - Defined methodologies for measuring and assessing costs and benefits of various planning options (e.g. transmission vs. generation). - Established processes setting out how cost/benefit methodologies and analysis will be transparently applied Since the outcomes of the BSPP will inform Resources Adequacy ("RA") procurement

Topic	Feedback
	targets, it is critical that at each stage of the BSPP the IESO provide opportunity for stakeholders to both review IESO analysis and provide feedback for incorporation into final planning reports. At the outset of the BSPP the IESO should clearly establish the criteria to be applied to BSPP decisions. For example, the IESO notes that at the issue identification stage it may consider *market efficiency* when determining whether there are opportunities to alleviate transmission constraints that improve competition. In this scenario, stakeholders must be provided information sufficient to establish how the IESO is measuring market efficiency. (E.g. Defined time horizons, anticipated effects on competition including market entry and exit.) Stakeholders require this detail in order to provide constructive and relevant feedback to the IESO as part of the BSPP and all related engagements. Capital Power recommends that the IESO formally engage stakeholders on its proposed methodology for measuring efficiency gains, costs and benefits prior to finalizing its framework.

Process outcomes and information

Topic	Feedback
What specific types of information would you like to see come out of a Bulk System Planning Process that would be helpful for you?	The BSPP should produce information identified as required in future APOs. Previous comments from Capital Power have identified the types of information that should be included in the APO, including: • Gross, net, and grid energy demand forecasts (Province-wide, zonal)

Topic	Feedback
	• Inputs and variables used to forecast energy demand • Methodologies and models used to forecast energy demand • Methodologies and models used to forecast peak demand • Methodologies and models used to determine reserve margins (Province-wide, zonal) • Methodologies and models used to determine transmission zones and capacity zones • Total nameplate capacity and effective capacity supply assumptions for the province broken down by (i) individual resource, either existing or planned (ii) capacity zones/transmission zones • Methodology to determine effective capacity, UCAP or ELCC by technology type • Assumptions regarding schedules for retirement and refurbishment of nuclear generating units, risks to refurbishment schedules, and risks to adequacy resulting from schedule delays • Schedules setting out in-service and retirement schedules for all resources • IESO Contracted Generation List and any applicable updates to termination dates • Transmission security constraints and limits on transfer capability impacting energy delivery from area resources

Topic	Feedback
	• Planned transmission upgrades and expansions, with detail regarding expected impact of the upgrade • Transmission and intertie transfer capabilities and planned outages • Any issues identified by NERC relating to adequacy or reliability in Ontario and summary of IESO's responses to NERC where issues have been identified Further to the areas listed, it would also be helpful for the IESO to model the impact of various public policy outcomes. For example, fiscal and policy support for specific technology types/industries, interprovincial electricity trade, and environmental goals will each impact the costs and benefits of options available to the IESO and should be modelled as part of the overall BSPP.

General Comments/Feedback

Capital Power appreciates the IESO's efforts to formalize its BSPP and its engagement with stakeholders on this issue. A rigourous and transparent BSPP is a critical part of the foundation supporting competitive investment in Ontario. Early and effective communication, as well as opportunities for feedback from stakeholders on matters related to planning, is an integral aspect of ensuring that competitive tension works to attract efficient levels of investment, thus benefitting the Ontario ratepayer for years to come. Capital Power looks forward to further engagement with the IESO on this issue.