

# Feedback Form

## Transmission Planning Bulk Study Updates (South Central and Northern Ontario) – June 19, 2024

### Feedback Provided by:

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Following the June 19, 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](mailto:engagement@ieso.ca) by July 10, 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
What feedback do you have regarding the scope of work proposed?	We strongly support, as indicated by IESO’s plan, the inclusion of new nuclear and the potential for pumped storage in the bulk planning studies. In particular we are supportive of examining transmission expansion to enable both Bruce C NGS and Ontario Pumped Storage at Meaford. We also strongly support IESO’s stated plan to carefully coordinate between the Bulk Studies, including the overlap in the study in and around Essa TS. We would encourage that as part of the study coordination that IESO include a sensitivity / scenario as part of the Northern Ontario Bulk Study in which the potential Ontario Pumped Storage project at Meaford (connecting via Essa TS) contributes capacity and large-scale energy cycling to the system to elucidate additional potential benefits in the Harmer to Essa component of the North-South Interface.

Topic	Feedback
What other potential growth assumptions or resource scenarios should be considered as we quantify needs?	Given the very successful industrial expansions driving additional electrical load growth, and the increasingly entrenched growth prospects for data centres underpinning Canada’s emerging leadership in Artificial Intelligence, we would strongly encourage that planning criteria encompass provisions for high levels of growth, as there are economies of scale and scope in designing and building transmission for higher capacities.

Topic	Feedback
What additional information should be taken into account as we develop options?	As the IESO has reflected in previous webinars, planning must increasingly be sensitive to the accelerated timelines that customers are looking to connect to the grid and the pace of infrastructure development needed to successfully bring into service new supply and transmission facilities. These are continental, if not global, trends, and the availability of reliable, affordable and sustainable electricity are key underpinnings to Ontario’s investment and economic competitiveness. Combined with the availability of Investment Tax Credits and other mechanisms provided to induce more rapidly investment in electricity-related infrastructure, TC Energy supports any effort the IESO can utilize to ensure that infrastructure is available to meet rapidly growing needs.

## General Comments/Feedback

We strongly commend IESO’s Transmission Planning team for a well-crafted study plan, and in particular for addressing the coordination between the Bulk Studies.

In the LT2 procurement engagement, IESO has indicated that demand forecasts are being reevaluated to ensure continued system reliability. This is commendable in light of continued economic development successes and industry trends such as Artificial Intelligence-driven data centres as Canada (and Ontario) becomes an emerging centre of AI development. This is likely already under consideration, but we would ask that the Bulk Planning initiatives take the higher emerging load growth into account. We understand that similar levels of stakeholdering, studies, and time are likely required for small or large capacity additions via reconductoring, and for small or large capacity additions via greenfield development. We understand that there are also likely economies of scale and scope in pushing towards larger transmission capacities.

This being the case we would encourage the studies to encompass robust growth scenarios to accommodate load and the generation that will be required to serve it, as costs will be higher and economic growth as well as environmental objectives may be inhibited in due course if we do not take the current opportunity to prudently and economically accommodate more future growth at this juncture vs. having to start from scratch planning major additions later if we have erred on the low side in this round of planning and building.

We thank IESO for their thorough engagement and the opportunity to comment.