

Feedback Form

Gas Phase-Out Impact Assessment – May 27, 2021

Feedback Provided by:

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To promote transparency, feedback submitted will be posted on the Gas Phase-Out Impact Assessment webpage unless otherwise requested by the sender.

Please provide feedback by June 17, 2021 to engagement@ieso.ca. Please use subject:

Feedback - Gas Phase-Out Impact Assessment

Questions

Topic	Feedback
Are there additional considerations the IESO has not identified in defining the scope of the assessment to examine the reliability, operability, timing, cost and wholesale market implications of reduced emissions on the electricity system?	Not at this time other than noted below.

General Comments/Feedback

To phase out natural gas generators in Ontario is a daunting proposition. Aside from being a dispatchable resource to back up weather-dependent sources, it is also important as an alternative to transmission reinforcements and outages. Alternative dispatch options such as batteries or variable generation overbuilds are quite expensive and cannot provide the same confidence in supply duration nor availability.

To firm up weather-dependent sources, batteries and/or pump storage facilities would be needed. Under this scenario, every cloudy day or lack of wind would be a countdown suspense movie scenario to unwanted demand management. This is not what modern developed societies do.

The Quebec option, although somewhat viable, is not capable of replacing both the loss of Pickering and gas generation. Aside from the tremendous cost to facilitate imports on that scale, Quebec does not have the capacity to sustain these deliveries through winter peak periods. Hence, some other alternatives are still necessary, disqualifying it as a full alternative.

I am aware that the IESO is not tasked to dictate sources built or retained, but you are planning to present the best illustrative solutions to the gas phaseout probabilities. In 2009, OPG proposed refurbishing Pickering B. The idea was abandoned due to the purported prohibitive cost at the time as well as reliability (capacity factor) concerns but have become moot when compared to the current costs of alternatives within the new environmental constraints. As for Pickering B's reliability, it has improved consistently over the last decade. In 2020, its capacity factor was 87%.

Pickering B supports the electrical reliability of the GTA, providing needed voltage support and control, supporting grid stability as well as providing much needed inertia. To replace it with non-synchronous or electrically distant resources will require significant grid investment within the GTA proper yet alone the capability to import adequate energy. Hence, requesting a new proposal on a potential refurbishment of Pickering B does not seem out of the question and should be a consideration of this assessment. SMRs may be on the horizon, but it remains a distant one.