

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
<p>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?</p>	<p>The City of Mississauga (CoM) appreciates this opportunity to provide feedback to the IESO on its “Gas Phase-Out Impact Assessment.”</p> <p>CoM recommends that the following considerations are included in the scope of the assessment:</p> <ul style="list-style-type: none"> • Role of renewables and energy efficiency: the presentation provided in advance (“Gas Phase-Out Impact Assessment”) identifies three scenarios that will be analyzed by the IESO. Presumably, the reference to “new resources” in two of those scenarios includes renewable energy resources, such as wind, solar, and hydroelectricity from Quebec, but – in the event these are not contemplated – they should be taken into account in the assessment. This includes the use of various energy storage technologies that could assist in grid reliability. In addition, the IESO should focus on the role of energy efficiency initiatives, and how these could decrease the demand for electricity. • Economic Costs of a Changing Climate: the presentation identifies “Areas of Assessment” for the three scenarios. One area is “Cost and Wholesale Market,” which is focused on the costs of “supply technologies and transmission.” This area should also take into account the expected economic costs of climate change to IESO under each of the three scenarios (e.g., it would be anticipated that a complete phase-out of natural gas by 2030 would lead to less extreme weather events and therefore less damage to IESO infrastructure, as compared to a scenario that involved the use of natural gas after 2030). • Greenhouse Gas Emissions in Each Scenario: the IESO should consider greenhouse gas (GHG) emissions under each of the three scenarios, and the impact that each scenario will have on the ability of the Province and municipalities to reach their GHG emission reduction targets. Under “A Made-in-Ontario Environment Plan,” the Province committed to decreasing GHG emissions 30% (as compared to 2005 levels) by 2030. A number of Ontario municipalities have set more ambitious targets. This includes CoM, which has committed to decreasing GHGs 40% by 2030 and 80% by 2050. To help reach these targets, CoM has set out actions in its Climate Change Action Plan (CCAP). A number of these actions rely on electrification, including promoting an increased uptake of electric vehicles in the community, electrifying CoM’s corporate fleet, and encouraging the use of electricity to heat homes. It will be impossible for CoM to meet its targets if the electricity grid continues to get dirtier. An estimate of GHG emissions under each

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	<p>scenario will assist the Province and municipalities in understanding impacts on achieving GHG reduction targets.</p> <p>In addition, it would be helpful if IESO could clarify "Scenario 3," which currently reads "reduce emissions by 2030 with a supply mix approach of new resources." This is ambiguous: is there a target for reducing emissions under this scenario? If so, what is it? And, as noted above, it is unclear what is meant by "new resources."</p>

General Comments/Feedback

There are a number of additional issues that the IESO should keep in mind as it carries out its assessment:

Urgent Action is Needed: the IESO currently contemplates that there will be an increased reliance on natural gas until the nuclear refurbishment program is complete in 2033. That means that the electricity grid will be much dirtier than it currently is for more than a decade – and that’s only if refurbishments are completed on time. While this may seem like a short amount of time, this is a critical period in the fight against climate change. In its recent publication "Net Zero by 2050: A Roadmap for the Global Energy Sector," the International Energy Agency (IEA) indicated that "the path to net-zero emissions is narrow," and outlined over 400 key milestones that need to be met before 2050. In regards to electricity, the IEA noted that "generation will need to reach net-zero emissions globally in 2040..." Alternatives to natural gas must be in place well before then.

Designate a Point of Contact for Municipalities: CoM encourages the IESO to designate a staff member as a point of contact for municipalities. This will help keep the lines of communication open between the IESO and municipalities and foster productive working relationships. Many municipalities are relying on a low carbon electricity grid in order to meet their emission reduction targets, and IESO and municipalities will need to work together to make this a reality.

Partner with Private, Public, and Non-Profit Sectors: CoM encourages the IESO to establish partnerships with private, public, non-profit, and academic organizations to fund and carry out research needed to generate zero-emissions electricity.