

Feedback Form

Gas Phase-Out Impact Assessment – May 27, 2021

Feedback Provided by:

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Date: June 17, 2021

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?	Click or tap here to enter text.

General Comments/Feedback

The IESO should fully examine alternatives to gas generators, and identify resource types and innovative solutions that can provide gas-equivalent intermediate and peaking capacity, as well as ancillary services at no-emission. For example, the IESO should recognize and further value hydropower's ability to provide the full range of system needs, including storage. In addition, the IESO should consider its significant wind assets and design markets, products, and other revenue streams and incentives to pair them with storage capabilities. This wind+storage hybrid-solution would a) avoid stranding existing wind assets that are coming up to contract term, b) preserve the value of transmission infrastructure already invested to connect said wind assets, c) avoid replacing older wind project by new wind projects with no improvement to system reliability or emissions-reduction, and d) preserve the value of high wind potential sites occupied by existing wind assets.

In this direction, we are encouraged to see the IESO consult on hybrid integration. However, to echo our comments submitted in the Resource Adequacy consultation stream, investment in new and innovative solutions require longer-term competitive contracts and funding, along side new markets, products, and other revenue streams (e.g. regulation up and down) where investors can recover costs. Independent Power Producers are best positioned to take on such challenges and risks, and we welcome the IESO to further its discussion with the private sector.