

Feedback Form

Gas Phase-Out Impact Assessment – May 27, 2021

Feedback Provided by:

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Date: May 31, 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
<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>Encouraging rooftop solar needs to be a priority. Solar generates most during the summer daytime, which is when demand is highest. Solar reduces demand on the transmission system, and if encouraged enough, can allow deferral of transmission investments.</p> <p>The current net metering program is in need of review. Today's program is designed to limit uptake, and make it difficult. The program was designed years ago, when panel capacities were much smaller. 10 years ago, a panel was 180 W. Today it can be 350 W. So rooftops can have double the output in the same sq area.</p> <p>Problems with the current program: Credits for electricity cannot be used to apply to distribution/transmission fixed charges. Why? Money is money – the LDC could pay for their costs using a credit on account.</p> <p>Credits expire if they have not been used for a year, with the LDC taking all of the revenue from selling the surplus generation to others. Why not continue to allow it as a credit?</p> <p>In rural areas especially, Hydro One has deemed that there is no capacity to install additional net metering. The limits appear to be based on arbitrary rules, rather than sound technical reasons. After all, Germany, Hawaii, California, and many other jurisdictions have figured out how to do it. We should too.</p> <p>There is an arbitrary limit of 10 kw without requiring a costly Customer Impact Assessment. The limit should be reviewed, as it a significant barrier, especially as the capacity of panels have increased.</p> <p>Embedded generation currently supplies about 6 TWh, or more than 2% of supply. Much of this is solar. But it could easily be 3-4 times more with the right policies.</p>

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	<p>The right net metering policies can unleash a wave of private sector investment with zero cost to the system, and significant benefits from daytime/summertime peak supply. Today, a net metering customer receives a credit of 9.8 cents for the first 600 kWh/month, and 11.5 cents after that. The LDC in turn sells most of this at 11.3 or 17 cents/kWh (mid and on peak supply). Rooftop solar saves the system money, and should be encouraged.</p> <p>Supply from net metering makes less sense in time substantial Surplus Baseload Generation. But the closing of Pickering changes that drastically.</p> <p>While it is not the role of IESO should not make detailed recommendations about net metering policy, the IESO should suggest a review of the policies, to encourage additional supply.</p>

General Comments/Feedback

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