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?	1. It is a serious mistake to evaluate options for electricity supply separate from other aspects of energy policy, including conservation, building design, thermal and power storage, demand response, connectivity, transmission and the use of pricing so that demand follows supply rather than the other way around. It is hugely wasteful to build a peak power demand capacity, and to meet it with gas, instead of making a serious effort to reduce peak loads and to move them off-peak. There are many better ways to provide the energy that Ontarians need. See, for example, the Environmental Commissioner of Ontario's 2018 report, Making Connections. 2. Proper energy planning should follow the principles set out in the Environmental Commissioner of Ontario's 2016 report on long term energy planning. 3. The electricity system is just a small part of Ontario's economy. The global urgency of climate change, and considerations of Ontario's fair share, mean that Ontario must reach net zero emissions well before 2050. From an economy-wide point of view, conservation and eliminating fossil fuels in the electrical system are two of Ontario's cheapest options; see chapter 3 of the Environmental Commissioner of Ontario's 2018 report Climate Action in Ontario. 4. Zero-carbon electricity would provide an important competitive advantage for Ontario businesses. 5. Burning gas imposes large costs on the local environment and human and animal health, including through air pollution. In addition, there is increasing evidence that there are substantial leaks of unburned gas in the "well to end-user" system. These methane leaks contribute to smog and are major climate pollutants. 6. The IESO should carefully investigate opportunities to productively use all waste heat, including the heat that nuclear stations dump into the Great Lakes. Could this heat be piped to appropriate load centres?

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	7. The IESO should be much more transparent than in the past about opportunities to import hydro power from Quebec, and to increase pumped (or similar) storage in Ontario. 8. The IESO has tended to ignore and under-estimate the cumulative impacts and advantages of distributed renewable energy projects, including their benefits in increasing resilience and in increasing the democratic engagement of Ontario residents in our energy system. 9. The IESO's plan should be consistent with international norms for a stable climate, including the recent Net Zero report by the International Energy Agency. Among other things, this report calls for a ban soon on new gas boilers, and for a massive reduction in fossil fuel use across all global economies.