

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?	Click or tap here to enter text.

General Comments/Feedback

I have two concerns with the assessment study as outlined:

- The use of a baseline approach that assumes that the three scenarios are 'subtractions' from that baseline.
- The decision that the analysis will not "Assess demand impacts from decarbonization of the economy"

The first means that the whole study depends on the baseline (in general baseline-based approaches are not a good way to explore alternative futures) and the second means that that baseline will not be very meaningful. In other words, if I understand properly what is planned, these two issues will compound each other and mean that there will be no integrated supply-demand analysis undertaken, nor any attempt to build up different scenarios in terms of their internal coherence and logic.

For example, it does not appear that there will be any analysis of distributed generation, community-scale energy systems, and major changes to the socio-technical and socio-economic drivers that actually determine electricity use. It sounds as if some kind of baseline of electricity demand will be created but not analysed, and then the bulk of the analysis will focus on electricity supply and emissions, the latter using "an average of electricity sector emissions from 2016 to 2020"(!). This not only ignores many possible scenarios but it also in essence determines that the study will find that it is extremely difficult and expensive to back out of gas (a clear prejudgement already conveyed in the slide deck). In this sense this seems to be a case of the conclusions driving the analysis, sometimes called the creation of policy-based evidence.

I think that what is needed instead is an integrated supply-demand systems analysis that pays attention to change in underlying drivers of energy use, including structural changes in the economy and changing patterns of lifestyle and behaviours, and then constructs scenarios of different patterns of electricity supply and demand systems, to explore different pathways for getting off gas.