

IESO York Region Non-Wires Alternatives (NWA) Demonstration Project and Innovation and Sector Evolution White Papers – Feedback Form

Webinar Date: December 12, 2019

<u>Date Submitted:</u> 2019/12/18 Revised: 2020/01/14	<u>Feedback Provided By:</u> Company Name: Grand River Energy Contact Name: Mark Savel Contact Email: [REDACTED]
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Following the December 12, 2019 public webinar outlining the concept design of the IESO York Region NWA Demonstration project and the white papers on NWA Markets and Transmission-Distribution Interoperability, the IESO is seeking feedback from participants on the draft white papers and specifically on the design of the demonstration project.

Feedback received will be considered in order to shape the design for the demonstration project, including processes, timelines, resource eligibility, and service agreement of the demonstration. The IESO will work to consider and incorporate comments as appropriate and post responses on the engagement webpage.

The referenced presentation and white papers can be found under the December 12, 2019 entry on the Innovation Sector Evolution White Paper Series Engagement [webpage](#).

Please provide feedback by January 10, 2020 to engagement@ieso.ca. Please use subject: *Feedback: IESO York Region NWA Demonstration Project*. To promote transparency, feedback submitted will be posted on the Innovation and Sector White Paper engagement [webpage](#) unless otherwise requested by the sender.

Thank you for your time.

Table 1 – Topic: Concept Design of York Region NWA Demonstration Project

Question	Feedback
How can participation in the demonstration auction be maximized?	A larger market of projects could participate if LDC / Utility affiliates were allowed to participate
What are challenges/opportunities to the adopted T-D model?	
Are demonstration timelines reasonable?	
Are the proposed eligibility requirements reasonable?	<p>More projects would be eligible if LDC / Utility affiliates were allowed to participate. LDC / Utility affiliates are stand alone businesses like any other and a deliberate restriction to access revenue streams from this program or others, is punitive and not representative of fair trade. The affiliate business in Ontario is relatively new compared to well established Utility affiliates outside Ontario such as Nextera, EDF, Enelx and others. These companies are examples of affiliates of regulated distribution and/or transmissions companies in their parent company countries that have successfully expanded. In contrast, a policy to restrict access to Ontario affiliates would harm our ability to grow and expand. We support fair trade and open access to markets which is consistent with Canadian trade policy.</p> <p>Further, when one considers the extent of Ontario electricity rate payer funds that have been directed outside of Ontario from the FIT program to large international Utility affiliates, it seems particularly damaging to restrict Ontario affiliates from participating in our own programs.</p>
Are there other issues that are important to the success of the demonstration?	

