

Feedback Form

Transmitter Selection Framework – April 22, 2025

Feedback Provided by:

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Date: 21/05/2025

To promote transparency, feedback submitted will be posted on the "[insert engagement webpage](#)" unless otherwise requested by the sender.

Following the April 22, 2025 engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on Transmitter Selection Framework Registry (TSF-R) Design. The webinar presentation and recording can be accessed from the [engagement web page](#).

Please submit feedback to engagement@ieso.ca by **May 21, 2025.** If you wish to provide confidential feedback, please submit as a separate document, marked "Confidential". Otherwise, to promote transparency, feedback that is not marked "Confidential" will be posted on the engagement webpage.

In your view, do the draft Registry program rules appropriately balance the need for transmitter qualifications with the goal of encouraging broad participation?

We note that the framework proposes the evidence which would need to be provided by an Applicant to be eligible to participate as a Non-existing Ontario Transmitter. We would like to propose the following amendments to encourage broad participation to maximise the competition benefits (further outlined in general comments/feedback below), and not unnecessarily limit the parties who can participate.

We would suggest that rather than limiting the qualifying project locations as currently proposed, we would suggest the criteria focusses more the Applicant's ability to deliver similar projects as part of the registration process. There could be some technical criteria as part of this evidence, for example delivery of projects at transmission voltage, of a minimum length and commercial operation time.

We would also propose that rather than requiring Applicants to have met all the requirements for transmission lines in relation to project phases (i.e. planning, developing, financing, constructing, owning and operating), amend the criteria to be that the Applicant must evidence its experience for the phases it can, and provide a business implementation plan or consortia formation plan to fulfill the other requirements.

Do you have any concerns with the application or renewal process as proposed (e.g., two-year term, renewal triggers, documentation)?

Are the proposed provisions regarding Indigenous community participation and exclusivity arrangements sufficiently clear and practical to implement?

Are there any outstanding barriers which could interfere with transmitters participating within the TSF registry?

Do you have any additional feedback regarding the TSF of the TSF Registry that the IESO should consider?

Do you have any feedback on the TSF Registry registration fee and the rationale behind it?

General Comments/Feedback

We welcome the opportunity to provide feedback on the Independent Electricity System Operator's (IESO) proposed Transmitter Selection Framework. The need for transmission delivery at pace is a well-recognised challenge with the growth of electrification globally and to avoid delays in the efficient deployment of renewable sources of generation.

Competition encourages innovation in the design, delivery and operation of new transmission infrastructure, which can also deliver cost and time savings relative to non-competitive delivery. Whilst cost savings can vary from project to project, in the UK there is evidence to suggest that competitive delivery of infrastructure, such as transmission assets, on average will lead to cost savings. The GB energy regulator Ofgem has estimated that savings could be in the region of 20% relative to a regulated counterfactual¹.

The successful Applicants that will deliver the projects face strong incentives to deliver on schedule, as they are not able to operate (and therefore receive revenue) until the project is delivered. This in turn encourages parties to identify solutions that will deliver projects on (or earlier) than scheduled and therefore, the benefits are provided sooner. Competition benefits are best realised when there is a large and stable pipeline of projects to be competed, where learnings and efficiencies can be rapidly built on by all involved. This is evidenced by the success of the OFTO regime and the CfD auction rounds in the UK, which have supported investor confidence, interest, and over the years, reduced the transaction costs associated with the process.

We hope the contents of this feedback form are helpful, and we would be pleased to discuss any of the points raised.

¹ Ofgem (2022) Early Competition Impact Assessment. Available at <https://www.ofgem.gov.uk/sites/default/files/2022-03/Transmission%20Early%20Competition%20IA.pdf>