

Feedback Form

Electricity Planning in the West of London Area – November 26, 2020

Feedback Provided by:

Name: Brandy Giannetta

Title: Senior Director, Ontario

Organization: Canadian Renewable Energy Association (CanREA)

Email: [REDACTED]

Date: December 17, 2020

Windsor-Essex Integrated Regional Resource Plan Addendum Study

Topic	Feedback
What feedback do you have regarding any of the options proposed?	See general comments below

Topic	Feedback
What other information should be considered in the continued development of these solutions leading up to the recommendations?	See general comments below

West of London Bulk Study

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General Comments/Feedback

The IESO is seeking feedback on the options presented in the November 26, 2020 webinar as well as suggestions on information to assist the planning process.

The Canadian Renewable Energy Association is the voice for wind energy, solar energy and energy storage solutions that will power Canada's energy future. Since July 1, 2020, we have begun to work to create the conditions for a modern energy system through stakeholder advocacy and public engagement. Our diverse members are uniquely positioned to deliver clean, low-cost, reliable, flexible and scalable solutions for Canada's energy needs. Our vision is to ensure wind energy, solar energy and energy storage play a central role in transforming Canada's energy mix.

CanREA offers the general points below for consideration in response to the November 26, 2020 webinar. Additionally, we would appreciate the opportunity to meet with IESO staff to discuss these matters further. We will be reaching out to your team to schedule a meeting at your earliest convenience.

Summary of key commentary stemming from the November 26th session:

- CanREA recognizes the need for fast and flexible deployment of appropriate resources to meet growing demand.
- DERs and some generating assets (storage, solar) can grow with load to ensure no infrastructure overbuild thus reducing risk to ratepayers.
- CanREA members would be ideally suited to provide solutions for the Windsor-Essex and West of London areas as they are well positioned to provide the types of multiple solutions the

IESO is seeking in this engagement – solutions such as DER, Non-wires options, generation - both behind-the-meter and at utility scales.

- CanREA supports options for enabling consumers to invest in behind-the-meter solar PV generation, either stand-alone or paired with energy storage. A modest expansion of the scope of the Ontario Ministry of Energy, Northern Development and Mines' Community Net Metering pilot project for example, could allow for these projects to move forward on a trial basis.
- Solar PV is well suited to meeting rapidly increasing summer peak demand in Windsor-Essex and West of London, can be readily located in a specific area of the grid where it is of optimal use from a congestion mitigation standpoint, and can be deployed in matter of months.
- In addition to allocating investment risk toward individual commercial and industrial consumers as opposed to Government or ratepayers as a whole, BTM DER solutions can contribute to lower power prices, reduced greenhouse gas emissions, enhanced industry competitiveness and job creation. These solutions help to mitigate line losses, reduce the risk of potential transmission and distribution overbuild, and reduce peak demand in a targeted and optimally efficient manner, contributing to lower overall costs for all consumers.
- The IESO is seeking additional information to help fill the data gaps and we agree and appreciate that more information is indeed required to ensure all resources have equal opportunity to put forward considerations for solutions.

It is imperative that the IESO integrate this process with the broader IESO resource adequacy consultation and community net metering initiatives.

- Solutions to address supply needs arising in 2025 need to be secured several years in advance. Solutions that are both scalable and cost effective require as much lead time as possible to provide the maximum benefits – to the system and the ratepayer.
 - o This process will need to be refined and should include an opportunity for price discovery and other qualifying considerations so that appropriate mechanisms (i.e., RFI and RFP) can be developed in time to procure the best resources to meet the needs identified

CanREA would very much appreciate a meeting to further explore these themes in early 2021.