

# Feedback Form

---

## Electricity Planning in the West of London Area – July 15, 2021

### Feedback Provided by:

Name: Emma Coyle

Title: Director, Regulatory & Environmental Policy

Organization: Capital Power

Email: [REDACTED]

Date: August 13<sup>th</sup> 2021

West of London Bulk Plan



What feedback do you have regarding the preferred option of a combination of new transmission line from Longwood TS (near London) to Lakeshore TS (Leamington) and local generation?

Capital Power appreciates that the IESO is seeking feedback on the options identified by the IESO in its July 15<sup>th</sup> presentation. However, Capital Power believes that more information from the IESO is required in order for stakeholders to provide constructive and informed feedback to the IESO – feedback relating both to the prudence of the preferred option and the IESO’s process for determining the universe of options available and associated costing.

In its presentation to stakeholders, the IESO noted that it continues to hear that access to additional data is important to enable the development of solutions, yet the data referenced has not yet been provided to all stakeholders. The IESO appears to have committed to providing the information listed in the Appendix of this form to stakeholders following the July 15<sup>th</sup> webinar, but the information has not yet been published. It may be that the IESO in fact meant to say that the information would be provided following publication of the West of London bulk plan report, but this report has not yet been published. This information should be provided to all stakeholders prior to soliciting feedback on the proposed solution.

Lastly, Capital Power supports the IESO’s efforts to use an analytical framework that seeks to compare possible generation and transmission solutions on a level playing field. However, it is not clear why the use of a 70-year amortization (the useful economic life of transmission) should be used to assess the cost of available options. Since 2016 the IESO has conveyed to stakeholders that it will actively seek to avoid long-term commitments because forecasts and technology costs may change in the future. Accordingly, it is not clear how the IESO has justified the use of a 70-year amortization – a term which extends 45 years past the IESO’s

Topic	Feedback
	<p>best available forecast, for the purpose of comparing costs. Capital Power understands that it may very well be the case that transmission investments are necessary under any scenario, but it is not clear to Capital Power the criteria by which the IESO determines what term of commitment to use when assessing costs.</p> <p>Capital Power respectfully requests the IESO identify its framework for assessing costs/benefits of competing solutions, the analysis undertaken in accordance with the framework, and the IESO's process for engaging with all potential solution providers – not just transmission providers – in determining the range and expected cost of options available.</p>
<p>What feedback do you have regarding a 230 kV versus 500 kV line?</p>	<p>The information described above, and in the Appendix, is required prior to providing feedback on this question.</p>
<p>What other information should be considered in finalizing the recommended solution and final report?</p>	<p>Capital Power would like to understand how the IESO engaged generators and other competitive service providers during its assessment process. It is not clear what generation options were considered, nor is it clear the extent to which incumbent and existing generators were engaged for the purpose of identifying competitive solutions.</p>
<p>What feedback do you have regarding the proposed list and format of datasets that will be made available with the West of London Bulk Plan (see Appendix)?</p>	<p>No additional comments at this time.</p>

## Windsor-Essex Integrated Regional Resource Plan (IRRP) Addendum

Topic	Feedback
<p>What feedback do you have regarding the preferred option for additional local 230 kV load supply stations and connection lines to the Kingsville area?</p>	<p>Comments provided regarding the West of London proposed solution, apply here as well. More information is required from the IESO in order for stakeholders to provide constructive feedback.</p>
<p>What feedback do you have regarding the options to address load restoration needs in the Kingsville and Leamington area? Including a potential new 230 kV double-circuit line between Leamington TS and the proposed new stations, or resource alternatives.</p>	<p>No additional comments at this time.</p>
<p>What feedback do you have regarding the considerations for long-term generation in the Windsor area?</p>	<p>Comments provided regarding the West of London proposed solution, apply here as well. Importantly, as an asset owner in the Windsor-Essex Area, Capital Power would like to understand how the IESO has, and will, plan to engage with existing and potential generation owners and investors in order to assess competitive solutions available to meet regional needs. Frameworks for measuring the economic benefit of various generation/transmission options should consider whether the resource will be capable of meeting local and bulk system needs, and benefit should be assigned to resources that can provide dual benefit.</p>
<p>What other information should be considered in finalizing the recommended solution and final report?</p>	<p>No additional comments at this time. When coupled with the information requested in this feedback, the information listed in the Appendix appears appropriate.</p>

## General Comments/Feedback

# Appendix:

## West of London – Information Sharing Summary

The following table outlines the datasets that will be made available with the West of London (WOL) bulk study, as well as the format.

<b>Category</b>	<b>Format</b>	<b>Description of Data</b>
Planning Assessment Criteria	PDF, in report	Technical requirements and standards used to determine needs
Load Forecast	PDF, in report	Methodology and sensitivities/known drivers
Load Forecast	PDF, in report	Total West of London Annual coincident low, reference, and high scenarios for summer and winter
Load Forecast	PDF, in report	Annual station peak forecasts, by region
Load Forecast	PDF, in report	Annual greenhouse peak forecasts
Load Forecast	PDF, in report	Peak segmentation assumptions for West of London stations with greenhouse load
Load Forecast	Excel	Forecast West of London greenhouse hourly load profiles (2021, 2035)
Load Forecast	Excel	Forecast West of London total hourly load profiles (2021, 2035)
Load Forecast	Excel	Historical hourly station load profiles (2019)
Interface Data	PDF, in report	Capacity need methodology, Interface definition, limits, and driving issues
Interface Data	Excel	Hourly capacity need, no reinforcements/recommendations (2028-2035)
Interface Data	Excel	Hourly capacity need, with near-term recommendations (2028-2035)
Interface Data	Excel	Hourly capacity need, with near- and long-term recommendations (2028-2035)
Analysis of Alternatives	PDF, in report	Assessment criteria and principles for decision-making
Economic Assessment Assumptions	PDF, in report	Assumptions used in the analysis and evaluation of options