## Feedback Form

## Regional Electricity Planning in the London Area – December 1, 2025

## Feedback Provided by:

Name: Katherine Sparkes

Title: VP, Grid Solutions

Organization: Enwave Energy Corporation

Email:

Date: December 15, 2025

To promote transparency, feedback submitted will be posted on the <u>London Area engagement</u> <u>webpage</u> unless otherwise requested by the sender.

The Independent Electricity System Operator (IESO) is seeking feedback on the draft demand forecast and scenarios. A copy of the presentation and the webinar recording can be accessed from the engagement web page.

Please submit feedback to engagement@ieso.ca by December 15, 2025.

Topic	Feedback
What additional information, if any, should be incorporated in the proposed scenarios? How can the proposed scenarios best capture the range and	As Enwave has noted previously in this London IRRP engagement and in other IESO engagements for IRRPs in other areas of the province, the reference forecasts for the IRRPs generally assume electrification via stand-alone in



Торіс	Feedback
uncertainty of growth potential while informing near-term infrastructure investments?	building solutions. Enwave requests that all IRRPs in any areas with existing district energy systems or that could support new district energy systems include a scenario that looks at how district energy can provide a lower peak demand and overall electricity consumption approach to building heat electrification than stand-alone in building electrification.
What areas of concern or interest about electricity should be considered as part of the planning process?	In its response to Enwave's feedback on the April 2025 webinar for this London IRRP, the IESO noted that the Nelson TS station refurbishment was completed in 2022 and that subsequent to this refurbishment a medium-term station capacity need remains. Enwave asks that the IESO and IRRP Technical Working Group (TWG) consider how local generation and DERs – including Enwave's London District Energy (LDE) existing generation assets in the area – could be used to address capacity constraints at this station in addition to general bulk-system electricity needs. Enwave requests to talk with the IESO and TWG about the use of local generation as a non-wires alternative to address this and other local needs.
What information is important to provide throughout the engagement? Does the proposed Engagement Plan provide sufficient scope and opportunities for input? What other engagement activities or methods should be considered?	Enwave requests that the IESO and TWG outline and provide to resource owners any information they would require from Enwave or other distributed energy resource owner/operators in the area to ensure that these solutions are fully evaluated as part of the IRRP options for London as part of this IRRP cycle.

## General Comments/Feedback

Enwave thanks the IESO and the London Area TWG for the opportunity to provide comments and participate in the development of the London Area IRRP.

As noted by the IESO in the Dec. 1, 2025 presentation, there are few sources of local generation in the London area and so the region is largely reliant on electricity brought in from other areas via the transmission system. As one of the few sources of local generation, Enwave's London District Energy (LDE) generation facility plays an important role in supporting local reliability and resilience.

Enwave requests that the IESO and TWG's options analysis for meeting the electricity needs of the London Area includes an assessment of potential additional opportunities for existing local generation – including Enwave/LDE's facility – to support the system needs identified in the 2025 London Area Scoping Assessment. These needs could include and not be limited to addressing capacity constraints

at Nelson and Talbot TS amongst other needs. Enwave further requests that the IESO and TWG identify and assess specific procurement approaches that would allow local generation and supply to be used as non-wires alternatives to address TS capacity needs and other system needs while also providing capacity to the IESO under existing or new capacity contracts.

Finally – as noted by the IESO team during the webinar, the pace and rate of load growth in the London area is uncertain due to increased near-term economic uncertainty. A critical way to mitigate the potential impacts of this load growth uncertainty while ensuring sufficient supply is to maximize the value of existing local supply side resources.