

Feedback Form

Regional Electricity Planning in the London Area – April 1, 2025

Feedback Provided by:

Name: Jennifer Murphy

Title: Manager Energy Policy & Planning

Organization: Enbridge Gas Inc.

Email: [REDACTED]

Date: April 15, 2025

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

The Independent Electricity System Operator (IESO) is seeking feedback on the scoping assessment report. A copy of the report and a narrated video presentation can be accessed from the [engagement web page](#).

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

Topic	Feedback
What additional information should be considered as part of the Scoping Assessment?	Click or tap here to enter text.

Topic	Feedback
What additional considerations, based on local developments, should be taken into account for the areas identified as requiring further study?	Click or tap here to enter text.
What other areas or specific considerations should be examined through regional planning?	Click or tap here to enter text.

General Comments/Feedback

Enbridge Gas thanks the IESO for the opportunity to provide feedback and has two recommendations for the IESO to consider in the London Area IRRP:

1. Include Enbridge Gas in the Technical Working Group to facilitate coordination of energy system planning.
2. When preparing demand scenarios, consider one or more scenarios that consider gas and electric systems working together to achieve GHG targets.

Enbridge Gas advocates for a coordinated approach to energy system planning between the electric and gas sectors. Effective coordination at both the distribution and transmission planning levels is essential to fully utilize existing infrastructure and address the increasing energy demands of the region. This would benefit the residents and businesses in the London Area region and Ontario more broadly by optimizing existing local energy systems (electric and gas), keeping costs down for ratepayers, while also minimizing GHG emissions. Given Enbridge Gas operates both the gas distribution and gas transmission systems, bringing Enbridge Gas into the IRRP Technical Working Group for the London Area would facilitate planning between the gas and electric systems for both levels of systems.

Enbridge Gas appreciates the efforts made by the IESO in including Enbridge Gas as an observer in the Ottawa Region working group and providing an opportunity to participate in discussions on the scenarios that were considered in the demand forecast. Collaboration efforts such as these examples enables more strategic and efficient investments to be made, delivering significant benefits to the subject region.

For these reasons, Enbridge Gas is prepared and formally requests the opportunity to work with IESO and the London Area Technical Working Group (TWG) on its IRRP for the region, and to explore the optimal scenario that leverages the benefits of both energy systems to meet the local energy needs.

In developing the IRRP electricity demand forecast, Enbridge Gas recommends considering a diversified scenario that includes both electric and gas system solutions, such as low-carbon gas (i.e., renewable natural gas [RNG] and hydrogen). Examples of electric and gas systems working in a coordinated manner are gas-fired power generation (on a system level) and hybrid heating and combined heat and power (on a site level). With the increased transmission and distribution of RNG and hydrogen in Ontario, GHG reductions can be achieved while maintaining system reliability

through the use of gas-fired generation plants to meet peak demands. This approach avoids overbuilding the electricity system to handle peak heat loads in winter, allowing natural gas usage to transition to low and zero carbon fuels over time.

Enbridge Gas believes that Ontario can benefit from a balanced and orderly transition to a low-emission and diversified energy system, incorporating new energy technologies over time. Ontarians expect – and deserve – access to reliable, resilient, and cost-effective energy systems. A collaborative and coordinated approach to energy planning can lead to better investments in both gas and electricity systems, driving optimal solutions for the London Area region.