

Feedback Form

Regional Electricity Planning in Toronto Region – February 16, 2023

Feedback Provided by:

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

Following the Toronto regional electricity planning webinar held on February 16, 2023, the Independent Electricity System Operator (IESO) is seeking feedback on the [draft Scoping Assessment Outcome](#) Report posted on the IESO's [website](#). The draft report and webinar presentation, which provides an overview of these feedback requests, can be accessed from the [engagement webpage](#).

Please submit feedback to engagement@ieso.ca by March 2, 2023. 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.

Topic	Feedback
What additional information should be considered as part of the Scoping Assessment?	Energy efficiency/Conservation and Demand Management (CDM): How will energy efficiency be encouraged or enhanced in the City of Toronto to reduce peak demand?
What other considerations should be made regarding the areas identified as requiring further study through a regional planning approach based on local developments?	
What other areas or specific considerations should be examined through regional planning?	Confirmation of how coordination of electric system and gas system planning will be factored into the regional planning efforts. More on this below.

General Comments/Feedback

Enbridge Gas believes that a coordinated approach to energy system planning between the electric and gas sectors will ensure that the most reliable, resilient and cost-effective pathway to emissions reduction is identified. Specifically, a coordinated and holistic approach to planning can ensure that energy systems in the Toronto and York Regions are optimized to support the regions in achieving their greenhouse gas (GHG) emission reduction targets. Coordination efforts should happen at both the distribution and transmission system planning levels to ensure existing systems are leveraged. Enbridge Gas is prepared and would welcome the opportunity to work with IESO and the core Toronto Working Group (Toronto Hydro and Hydro One Transmission) on its Integrated Regional Resource Plan (IRRP) for the Toronto and York Regions, and to explore the optimal scenario that leverages the benefits of both energy systems to meet the local energy needs. This collaborative approach could also include a review of any natural gas IRP Plans that may be identified in these areas.

In the development of the IRRP electricity demand forecast, Enbridge Gas suggests that a diversified scenario that includes both electric and low-carbon gas (i.e., renewable natural gas and hydrogen) be considered. For example, hybrid heating solutions that can support significant reductions to annual natural gas usage, and therefore GHG emissions, while also leveraging the existing gas infrastructure. This prevents overbuilding the electricity system to meet peak heat loads in the winter, and this energy can transition to low and zero carbon fuels over time. Low-carbon solutions, such as hybrid heating, also allows the gas system to continue to deliver the benefits of reliability (operation under normal conditions) and resiliency (operation under severe weather conditions), both of which are largely attributed to Enbridge Gas's vast underground pipeline infrastructure and invaluable energy storage. These system benefits can continue to be utilized in the coming decades. Enbridge Gas is

currently evaluating how the gas system infrastructure can be utilized to carry low-carbon gas to support Ontario's GHG emission reduction goals. A coordinated approach to system planning would allow for nascent technologies (both electric and low-carbon gas) the time to develop and to contribute to a long-term energy system plan while meeting short-term energy needs.

A good example of electric and gas systems working in a coordinated manner is hybrid heating. Hybrid heating allows customers to reduce emissions by pairing non-emitting electricity with natural gas for space heating. Customers can use either heating system when it is optimal to do so (i.e., gas fuel heating is optimal as the outdoor temperatures decrease). This coordinated approach allows for customers to lower their individual GHG emissions at site and provides time for Ontario's energy transition to unfold.

Enbridge Gas believes that Ontario can benefit from a balanced and orderly transition to a low emission and diversified energy system, with the incorporation of new energies 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 result in better investments in both the gas and electricity systems and drive optimal solutions for the Toronto and York Regions.