

Feedback Form

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Regional Electricity Planning in Windsor-Essex – April 19, 2023

Feedback Provided by:

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To promote transparency, feedback submitted will be posted on the [Windsor-Essex engagement web page](#) unless otherwise requested by the sender.

Following the Windsor-Essex regional electricity planning webinar held on April 19, 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 May 3, 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?	
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 Windsor-Essex area are optimized to support the region in achieving their greenhouse gas (GHG) emission reduction targets while meeting increasing energy needs. 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 Windsor-Essex Region Technical Working Group (TWG) on its Integrated Regional Resource Plan (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 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. Good examples of electric and gas systems working in a coordinated manner is gas-fired power generation (on a system level) and hybrid heating (on a site level). With the increase of RNG and hydrogen transmission and distribution in Ontario, GHG reductions will be observed while system reliability is maintained through the use of peaking gas-fired generation plants. This prevents overbuilding the electricity system to meet peak heat loads (including increased agricultural greenhouse needs) in the winter, and natural gas usage can transition to low and zero carbon fuels over time.

Additionally, while the Clean Electricity Regulation (CER) is still under development, energy optionality should remain. The CER framework was released in July 2022 and a draft regulation is anticipated in 2023/24. The current CER framework is technology neutral and not prescriptive in terms of approach and would allow for carbon capture and low-carbon fuels to achieve compliance as energy transition continues to unfold. This optionality would also provide operational flexibility and maintain electricity generation capacity in the area,

maintain and/or enhance system reliability and resiliency. This is particularly important for the Windsor-Essex area as there are four large gas-fired power generation facilities currently in service.

Enbridge Gas acknowledges that the County of Essex, City of Windsor, and other local municipalities have declared climate emergencies and call for cooperation in the reduction of GHG emissions. Enbridge Gas also notes that these communities have established energy plans, which are currently being updated. Enbridge Gas intends to review these plans to better understand local energy transition initiatives and goals, and to better understand how these elements may be accounted for in our demand forecast and infrastructure planning efforts, where specific actions are well understood, have clear timelines and impacts can be quantified. The IESO regional area of Windsor-Essex overlaps with Enbridge Gas's Southwest Operating Region, where we are currently implementing an IRP Pilot in the Southern Lake Huron area, which includes the City of Sarnia and the Town of Plympton-Wyoming in the County of Lambton. Recognizing that Windsor-Essex is not impacted directly by this IRP Pilot, Enbridge Gas would welcome the opportunity to provide joint non-pipe / non-wires alternative programming, where appropriate, in other overlapping regions in the future.

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 Windsor-Essex region.