

Feedback Form

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

Feedback Provided by:

Name: Julien Wu

Title: Director – Regulatory Affairs

Organization: Evolugen by Brookfield Renewable

Email: [REDACTED]

Date: May 3, 2023

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?

Evolugen by Brookfield Renewable supports the IESO's recommendation to proceed with an Integrated Regional Resource Plan, which would consider "a greater range of options, including non-wires alternatives."

While the IRRP would indeed take non-wire solutions into consideration, we urge the IESO to also consider non-wires solutions from existing assets in the region. For example, many wind facilities would come off contracts in the same time period during which the Preliminary Needs assessments have identified substantial load growth in the region. As such, existing system supply should be secured before considering increasing resource adequacy to meet incremental needs. With this in mind, the re-powering and re-contracting of existing assets could be a least-cost solution from generators with proven performance records. Such re-powering and re-contracting can be procured through competitive means, and the IESO could prioritize enabling innovative solutions to increase the system value of existing assets (e.g., wind + storage, uprates and expansions).

Further, the outcome report states that: "Technology type and sizing of non-wires options are based on capacity and energy requirements; a high-level cost estimate can then inform whether more detailed analysis is required." We recommend the IESO to include the value of ancillary services when evaluating non-wires solutions—as ancillary services are an essential component of system reliability.

In addition, we urge the IESO to publish additional information and data regarding how the IESO and Hydro One would evaluate wires vs non-wires solutions. This measure would improve transparency and help suppliers develop and propose solutions. For example, economics

Topic	Feedback
	data and information on how technologies are compared to each other and benchmarked, as well as maps that outline the available transmission capabilities would be helpful.
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?	We recommend the IESO to consult on and consider local load that might want to sign virtual Power Purchase Agreements with suppliers to construct their own FTM and BTM generator and/or storage assets in the region. This mechanism could help increase resource adequacy and allow load customers to make investment decisions with respect to their business needs.

General Comments/Feedback