

July 25, 2019

Independent Electricity System Operator (IESO)
1600-120 Adelaide Street West
Toronto, ON M5H 1T1
Via email: engagement@ieso.ca

Re: Draft Integrated Regional Resource Plan (IRRP) Recommendations for Toronto Region

TAF would like to thank the IESO for the opportunity to provide feedback to the Draft IRRP Recommendations. TAF has reviewed and fully endorses the recommendations put forward by the City of Toronto in its letter dated July 24, 2019. In addition, we would like to put forward the following recommendations:

Recommendation 1: That the IESO develop avoided cost estimates that are Toronto specific.

Given the unique energy constraints facing the City - which are substantively different from the rest of the Province - it is important that conservation and demand management is undertaken on the basis of avoided costs estimates are representative of the distinctive energy situation experienced by the City. Toronto specific avoided cost estimates could then be used in developing Toronto specific targets, budgets, and programs as part of the next conservation and demand management framework.

Recommendation 2: That the IESO, Toronto Hydro, and Hydro One collaborate with City of Toronto staff to evaluate potential delivery models and technical options for non-wires solutions, in advance of the next IRRP.

The IRRP has noted that non-wires solutions will be evaluated as options to address or defer emerging capacity needs expected to materialize over the next decade and beyond. However, given the limited experience using non-wires solutions to address capacity issues, and the recent changes to delivery of Conservation and Demand Management programming in Ontario, both the delivery model and the viable technical options for non-wires solutions are unclear. Therefore, there is little clarity on potential costs, schedule, and scope of non-wires solutions. This lack of clarity will make it difficult to properly evaluate non-wires solutions as options to address emerging capacity needs. Moreover, some of the most effective non-wires solutions may have long lead times (e.g. solutions

incorporated into major new developments), which will need to be understood and factored into decision making processes.

TAF would like to thank the IESO for the opportunity to provide feedback to the Draft IRRP Recommendations. We look forward to continuing to work with the IESO to support the development of an IRRP for the Toronto region. Please don't hesitate to contact us directly should you have any questions.

Sincerely yours,



Bryan Purcell
VP Policy & Programs, The Atmospheric Fund

The Atmospheric Fund (TAF) is a regional climate agency that invests in low-carbon solutions in the Greater Toronto and Hamilton Area and helps scale them up for broad implementation. Please note that the views expressed in this submission do not necessarily represent those of the City of Toronto or other GTHA stakeholders. We are experienced leaders and collaborate with stakeholders in the private, public and non-profit sectors who have ideas and opportunities for reducing carbon emissions. Supported by endowment funds, we advance the most promising concepts by investing, providing grants, influencing policies and running programs. We're particularly interested in ideas that offer benefits in addition to carbon reduction such as improving people's health, creating local jobs, boosting urban resiliency, and contributing to a fair society.