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January 24<sup>th</sup>, 2018

Independent Electricity System Operator  
1600-120 Adelaide Street West  
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Via email: ontarioregionalplanning@ieso.ca

## Re: Draft Scoping Assessment and Terms of Reference for Toronto Region

TAF would like to thank the IESO for the opportunity to provide feedback to the Draft Scoping Assessment, in particular, the draft IRRP Terms of Reference.

Toronto is currently facing changing energy needs as a result of increasing new development and population growth; a significant number of new transportation projects, protecting consumers against power outages through both weather and aging infrastructure; and the need to reduce energy related GHG emissions to achieve our 80% emissions reduction target by 2050, as prescribed in TransformTO, the City's climate plan.

It is essential that the IRRP reflects the changing energy needs of Toronto, and allows a certain amount of flexibility for the city to address these issues in a proactive and timely way. Generally, TAF is concerned that traditional large centralized infrastructure projects will not allow us to meet the city's urgent and unique energy needs.

Within this context, TAF would like to put forward three recommendations to enhance the scope and objectives of the Draft IRRP Terms of Reference, specifically:

First, we recommend that **the IRRP 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 the

avoided costs estimates are representative of the distinctive energy situation experienced by the City.

Second, TAF recommends that **the IRRP conduct an analysis of the technical potential of distributed energy resources (both conservation and generation)**. Given Toronto's unique existing energy infrastructure, there is a significant opportunity to expand energy capacity through distributed energy. These opportunities should be evaluated using locally tailored avoided cost estimates to determine cost-effective potential.

Third, TAF recommends that **the Conservation First Framework is applied to the development of the Toronto IRRP**. The Conservation First Framework establishes significant energy conservation targets for 2015-2020 - 8.7 TWh of electricity consumption - and it is essential that the IRRP build on and amplify these objectives.

Finally, we endorse the **City of Toronto's submission, including the value of having the City as a member of the IRRP Working Group**.

TAF would like to thank the IESO for the opportunity to provide input on the Draft Scoping Assessment and Terms of Reference for Toronto Region. Please feel free to contact us should you have any questions.

Sincerely,

Julia Langer  
CEO  
The Atmospheric Fund