



Meeting Notes

Regional Planning Process Advisory Group
(EB-2020-0176)
RPPAG Meeting #6

Meeting Date: August 19, 2021

Time: 9:30 am – 3:00 pm

Location: Ontario Energy Board
Zoom

Attendees:

RPPAG MEMBER

ORGANIZATION

Riaz Shaikh

Alectra Utilities

Charles Conrad

Association of Power Producers of Ontario (APPrO)

Amber Crawford

Association of Municipalities of Ontario (AMO)

Iain Angus

Common Voice Northwest

Faisal Habibullah

Elexicon Energy

Cara-Lynne Wade

Enbridge

Jie Han

Fortis

Ajay Garg

Hydro One Networks

Ahmed Maria

Independent Electricity System Operator (IESO)

Devon Huber

Independent Electricity System Operator (IESO)

Jac Vanderbaan

London Hydro

John DeVenz

Pollution Probe

Travis Lusney

Non-Wires Solution Working Group

Mark Rubenstein

School Energy Coalition

Matthew Higgins

Toronto Hydro-Electric System Ltd.



Chris Codd

Versorium Energy

Ontario Energy Board staff

Chris Cincar

Jason Craig

Natasha Gocool

These notes summarize the discussion during the working group meeting and key points of the issues presented in the published materials.

Meeting Agenda

1. Introduction:

- OEB staff outlined the purpose of the meeting was to discuss the following:
 - Revisions to RPPAG Recommendations – IESO-related
 - Revisions to Proposed RPPAG Recommendations – Other
 - Format of the RPPAG Document to the OEB’s Executive Team (if time permitted)

2. RPPAG Recommendations – IESO-related and ‘Other’

- ◆ A table summarizing the OEB staff’s understanding of the RPPAG’s feedback at Meeting #5 related to the IESO’s Final Report recommendations had been circulated to the RPPAG members prior to the meeting for review. The table also included additional “other” recommendations that members had proposed to include. That table was the focus of discussion.
- ◆ RPPAG members provided additional input on changes they felt were required and/or stated their approval of the revisions as set out in the table.
- ◆ The following discusses the recommendations that received material feedback:

IESO-Related Recommendations:

Clarify Scope between the RIP and IRRP

- ◆ Members noted the decision on a “material change” should not be limited to the two leads of the IRRP/RIP processes. Instead, agreement of all members of the Technical Working Group (TWG) should be required.
- ◆ It was noted that it could return to the IRRP process and there was a need to clarify that would likely involve one sub-region within a broader region. However, the RIP process would

continue to address the other sub-regions to ensure the 6-month timeline is met.

- ◆ IESO stated the assessment based on the material change will be done quickly to determine if a non-wires solution is plausible. However, if it is determined an NWA is a potential option, it will likely take more than 6 months to complete the analysis (i.e., longer than the RIP process).
- ◆ It was agreed that wording should be added to the RIP Report that discusses the material change, and the RIP Report will be updated once the IESO has completed the analysis of the material change. The document should be a letter from IESO to the transmitter which would form an Addendum to the RIP and thus result in an updated RIP Report.
- ◆ OEB staff suggested, since this would occur a few months after the IESO just completed a 21-month process that included a Scoping Assessment and IRRP, it should not return to the formal process and start the 21 months again as that would be inefficient. Instead, it should be similar to an expedited informal scoping assessment that will determine if the RIP continues to do further analysis of a wires solution or it returns to the IRRP to assess non-wire solutions, followed by an expedited IRRP process, where it's necessary.
- ◆ OEB staff noted that the IESO's licence does not currently contemplate this unique circumstance – return back to the IRRP from the RIP.
 - A member suggested the IESO get an exemption from the 18-month timeline. OEB staff noted that approach would likely take too much time as IESO would need to request it and the OEB would need to approve it. It would also result in some administrative burden for both the IESO and the OEB.
 - OEB staff therefore suggested it would likely be more efficient to amend the IESO licence to reflect this unique and rare scenario – additional analysis necessary that was triggered by an external factor – that was not contemplated when the initial licence amendments were made.

Better Consideration of Cost Responsibility

- ◆ Members were in general agreement that the revised changes to the recommendation reflected the feedback from the previous meeting.
- ◆ OEB staff added that the table would be updated in this section to reflect the RPPAG's recommendation that guidance from a dated OEB Notice (2017) be incorporated in a new OEB Bulletin so

stakeholders would be aware of it. That guidance related to cost recovery where communities elect a “premium” solution, such as a DER, that reflects “local preferences” but is more expensive than the “optimal” (i.e., most cost-effective) solution, such as “wires”, identified in a regional plan.

- ◆ OEB staff had requested feedback on previously prepared plain language document (Synopsis of Changes to the TSC) that had been circulated to the group in advance of the meeting. Staff specifically asked the group whether the type of language in that document would be appropriate for the document that the RPPAG was recommending that OEB staff prepare to explain the OEB’s Cost Responsibility rules applicable to regional planning. The feedback was positive,
 - A member suggested including footnotes or links to specific OEB documents such as the Codes
 - OEB staff noted they expected the plain language document on Cost Responsibility would be more technical in nature (than the TSC Synopsis document circulated for review) with references to specific Codes / Guidelines and related sections embedded directly in the text (rather than rely on footnotes).

Clarity on DER / Non-Wire Alternative (NWA) investments in terms of how costs are recovered under all scenarios:

- ◆ There was a request for clarity from the OEB on a regional solution that provides benefits to more than one LDC; specifically, how the multiple LDCs could share the cost of the asset. It was noted there seemed to be a gap as they could not find clear guidance from the OEB on how to address this situation.
- ◆ A member noted one way to share the cost under the existing rules was for one LDC to pay for (and own) the asset while the other LDC(s) provides that LDC owning the asset with a capital contribution.
- ◆ It was also noted that the OEB recently issued an OEB staff [Discussion Paper related to a CDM Guideline update](#) for comment. It discussed regional planning and an option that could be used for such purposes. OEB staff noted the RPPAG was not the proper forum to discuss that Discussion Paper and, if members had concerns, then comments on the Discussion Paper should be provided through the formal process.

Better Address End-of-Life (EOL) Asset Replacement in the Regional Planning Process:

- ◆ OEB staff reminded the group that they agreed the ESL information should be provided to interested stakeholders in the

planning process on a basis that is similar in nature to the interconnected New York ISO (NYISO).

- ◆ It was also agreed that since the ESL information is not sensitive like the “critical” information that NYISO was providing access to, the process to get the ESL information should not be as onerous and restrictive.
- ◆ The group acknowledged that developing a model similar to the NYISO would require logistical issues to be sorted out and would take some time.

Other RPPAG Recommendations:

General Education on Regional Planning Process to Stakeholders

- ◆ It needs to be clarified these general education sessions would not be undertaken by any single entity. Similar to when it was previously done in 2013, it should be a coordinated effort by the OEB and the two entities that lead the processes – IESO and HONI. It may also be beneficial to have some LDC involvement (i.e., been through IRRP process) depending on the audience.

Holistic coordination of Planning Processes – Regional. Bulk, Distribution, Natural Gas, Municipal:

Bulk Planning:

- ◆ OEB staff reminded the group that the recommendation addressed situations where the OEB is asked to approve a transmission investment in an LTC application and a number of other investments are also being planned that have linkages that may span multiple contiguous regions. The OEB Panel should be provided with information on all the planned investments with linkages from both Bulk & Regional Plans, to make a fully informed decision. The example used was Southwest Ontario (i.e., “West of London”).
- ◆ The recommendation involved the IESO preparing a RIP Addendum that summarizes all the investments that are being recommended and/or studied, including the estimated individual and aggregate investment costs.
- ◆ The IESO noted it was supportive of preparing such a document as they were doing something similar for “West of London”.
- ◆ A member raised a concern with the wording that approval of the transmission solution in the application could be viewed as also essentially “pre-approving” the other interdependent transmission solutions and the OEB should be aware of that. It was noted that,

while that's realistically what's happening, discussion of “pre-approval” should be removed and just focus on discussing the linkages and interdependencies in the recommendation.

- ◆ A member suggested that “resource adequacy” should also be discussed in the recommendation with the example of running a long-term procurement of a generation resource. OEB staff suggested that the recommendation focus on “planned” investments in a region and, in preparing such a document, OEB staff believed the IESO would take its resource procurements into account.

Natural Gas Planning:

- ◆ OEB staff noted that initial draft of the recommendation discussed IESO and Enbridge licence obligations to coordinate at the outset, but that had been scaled back and, instead, it could be first implemented as only an OEB “expectation”. And if it was subsequently determined an expectation did not suffice, it should be “required” (similar to the existing obligations placed on IESO, HONI and LDCs to work in consultation).
- ◆ A member noted they supported the current wording as they felt it an “expectation” represented a more balanced approach -- between a “requirement” in the prior draft and the existing “ad hoc” approach – given the current discussions related to converting to electric heat pumps from gas furnaces (i.e., “competing alternatives”).
- ◆ A number of members discussed the need to be informed of plans involving “fuel switching” for the purpose of electricity planning.
- ◆ IESO staff suggested that it was premature to have an “expectation” at this time. Instead, an informal approach involving existing engagement processes in the regional planning process should be relied upon. There would only be a need to go beyond that if Enbridge receives approval if the scope goes beyond non-pipe alternatives and also includes investing in electricity related investments.
- ◆ Another IESO staff person added that an OEB “expectation” should be retained but it should be limited to an expectation that Enbridge participate in the IESO’s engagement process.
- ◆ IESO staff also suggested that the recommendation should reflect that there may be policy direction in relation to this matter in the next Government long term energy plan (LTEP).
- ◆ Enbridge noted that they welcomed the opportunity to leverage the regional Technical Working Groups (TWG) to increase

coordination. OEB staff noted the reference to an “expectation” was limited to that type of coordination efforts.

- ◆ OEB staff summarized the discussion in noting there was a “need to reframe this recommendation” to say “existing engagement processes [in the regional planning process] should be relied upon at this time”. However, “that approach would not be sufficient if Enbridge were to get [OEB] approval to proceed on electricity related investments – beyond non-pipe alternatives – in a future [IRP] generation. There would then be a need to ensure greater coordination”. IESO noted “That sounds good” and Enbridge added “confirmation [from the IESO] of what the existing processes are and where we would bring any information would be required”.
- ◆ Ahmed Maria (IESO) and Cara-Lynne Wade (Enbridge) volunteered to work with OEB staff on a revising the recommendation to reflect the discussion at the meeting.

Municipal Planning:

- ◆ There was agreement that the education component was important and should be maintained, but many members felt it needed to go beyond that. It should be a two-way process improvement.
- ◆ It was noted municipalities need to provide more information – not just aspirational goals such as net zero. They should be providing information in terms of how such goals are expected to be achieved. Without such information, those aspirational goals cannot be translated into an LDC forecast.
- ◆ Another member suggested the recommendation should be revised to focus on the Technical Working Group (TWG) and the TWG should review the municipal planning documents for that region.
- ◆ An LDC member (Riaz Shaikh) noted that most of the municipal energy plans are created in conjunction with a consultant and they have gone back to the municipalities to request the data required for electricity planning from the consultant.
- ◆ OEB staff asked if the member could provide an example and the member responded that Markham was a good example where they had a goal of net zero by 2030 in their plan and the related data obtained from the consultant helped to further refine Alectra’s demand forecast. The member added that the municipalities need to be informed of what information is required for it to be a two-way street.
- ◆ OEB staff noted that what was explained largely still comes down to educating municipalities (on what information is needed).

- ◆ OEB staff also suggested that it would likely be more efficient to draft a one pager that set out a list of the type of information that was typically requested from the consultants. Such a document could be provided to all municipalities – rather than doing it on a one-off basis. The other benefit is municipalities (and their consultants) would know the type of information that is needed before developing their municipal energy plan (rather than LDCs reacting to each deficient plan after the plan had been developed).
- ◆ OEB staff asked the member if they could take the lead on preparing a draft of the one-pager with the list of information they had requested in the past and the member agreed to do so. Other members volunteered to assist.
- ◆ **ACTION:** Riaz Shaikh (Alectra) to take the lead on drafting a brief document setting out the type of municipal planning information that is needed for electricity planning for the group to review. Other members – Ajay Garg (HONI), and Amber Crawford (AMO) – volunteered to assist.

Open Stakeholder Access to Planning Information (*beyond EOL/ESL related*)

- ◆ Members were in general agreement that planning information should be made readily accessible by the IESO.
- ◆ IESO said they're currently working on making certain planning information available to stakeholders but have not yet reached a conclusion on the specific information yet and asked the group not to be overly prescriptive at this point in terms of what information should be available.
- ◆ IESO noted there is currently a test pilot underway -- West of London -- to determine how to best make the planning information available to stakeholders. IESO added that they are getting stakeholder feedback on how useful that information is.
- ◆ OEB staff asked when the stakeholder feedback was due and IESO noted they believed it was in September 2021.
- ◆ Members also suggested that the information IESO already committed to provide, as part of the West of London pilot, should be reflected in the recommendation as it would provide a starting point (i.e., baseline) to build on with further information.
- ◆ IESO noted that in terms of going beyond West of London commitments, IESO needed to take it back and discuss it internally in terms of whether there is any other planning information they could commit to, as part of this generic recommendation.

- ◆ A member suggested that the planning information to be made available should be based on FERC's Critical Electrical Information (CEI) since the CEI type of information should not be shared with the public for security reasons. The member noted they did not believe there was any other reason for not sharing information with stakeholders.
- ◆ The member also felt it would be helpful if IESO were to put together a list of information that is (and is not) CEI so the group does not recommend information that can't be made available to stakeholders.
- ◆ IESO noted that CEI is a U.S. designation and the IESO does not have its own designation process to differentiate between critical and non-critical information in order to implement a process of releasing information that does not impact system security. IESO added it could not make this determination without guidance from the Government of Canada.
- ◆ A member suggested a reasonable approach is to just adopt what the U.S. is doing as, ultimately, the Federal Government is going to end up in the same place since FERC has captured every security related issue in the sector. FERC's CEI could form a base case definition and IESO could alter it to remove information IESO is not comfortable releasing.
- ◆ All non-utility members of the RPPAG that have been involved in the regional planning process (and would benefit from the information) expressed the view that the IESO's licence should be amended to include an obligation to make planning information that won't impact system security accessible to stakeholders in order to formalize it. One member – transmitter – did not support a licence amendment.
- ◆ OEB staff noted, if there was a licence amendment. It would likely be based on three types of information -- critical, definitely not critical, and information that falls in a grey area where the IESO is not certain. Any licence obligation would likely need to focus on only one of those – IESO definitely knows it's not critical. Staff also noted they expected it would be high level (i.e., no security related concerns) as opposed to a prescriptive list of specific information.
- ◆ IESO noted this is not something that will be determined in a few weeks. A member noted it would be appropriate to provide the IESO with a fair amount of time to figure this out. They added the licence provision could say something like the information is to be released by the end of 2022.
- ◆ It was suggested the recommendation be broken down into a two-part recommendation: (1) Making planning information

available (full consensus); and (2) The licence obligation (not full consensus).

- ◆ A member suggested IESO could put forth a proposal to amend its licence to provide the data, once the test pilot is complete.

ACTION: IESO to discuss internally what types of information they are comfortable with releasing that goes beyond the pilot project commitment and will report back to the group at a future RPPAG meeting.

Removing the Option to Bypass the Integrated Regional Resource Planning (IRRP) Process:

- ◆ OEB staff provided a recap of the two primary issues in going directly to an RIP process from the Scoping Assessment (i.e., not undertake an IRRP). The opportunity for stakeholder input on the analysis of the actual options to meet the regional need(s) is removed. The decision not to further assess non-wires alternatives (NWAs) as potential solutions in developing the regional plan and not getting stakeholder input on potential solutions is also limited to members of the Technical Working Group – LDCs, Transmitter, IESO – which provides the TWG with a great deal of authority.
 - There is stakeholder engagement during the Scoping Assessment, but it's limited to whether NWAs and CDM should be considered when the regional plan is developed (i.e., whether to undertake an IRRP).
- ◆ Another concern identified is, in skipping the IRRP process, the transmitter has only 6 months to both assess the wires options and prepare the RIP Report – the same amount of time as when an IRRP is undertaken and IESO has assessed the wires options before the RIP process is initiated. That raises a potential concern about the efficacy of the RIP Report [used to support an application to the OEB].
- ◆ A transmitter noted there has only been one case where it went directly to a RIP process from the SA process (i.e., no IRRP) since 2013. Another member discussed how the system has evolved with a stronger emphasis on NWA and CDM solutions since 2013. [Note: Since no members, including the IESO and OEB staff, were aware of that one case, OEB staff followed up with HONI to obtain more information. HONI identified it was limited to an investment in a station that could have been addressed through a Local Planning process, but it was a high cost investment – new \$30M DESN station -- so the TWG felt the need to use a RIP process]
- ◆ IESO's primary concern is the loss of flexibility in removing the option to go directly from the SA to a RIP. IESO also believes the

stakeholder engagement process during the SA alone is adequate. IESO therefore wants to maintain that flexibility and does not see a problem with the current process. IESO also does not appear to share the concerns discussed above.

- ◆ IESO also discussed the inefficiency of an 18-month IRRP process if it can go directly to a RIP. The reference to 18 months was questioned as that is intended for complex IRRPs and one that could go directly to a RIP would be a simple IRRP and should take no longer than 6 months.
- ◆ A member added that the IESO does not actually need to await the completion of an IRRP process to start the RIP process as the current regional planning process provides IESO with the ability to advance a wires solution at any time from the IRRP. As a result, that flexibility is not really lost, and that inefficiency can be avoided. It was added that the IESO has rarely used that option of advancing a wires solution to a RIP process before the IRRP is completed.
- ◆ A member noted the clients that they deal with do not see any value in the engagement process at the Scoping Assessment stage and thus do not want them to be involved in providing feedback to the IESO prior to the IRRP process. OEB staff similarly noted they don't pay attention to the Scoping Assessment stage anymore since the outcome is known before the SA is completed – always an IRRP.
- ◆ Another member noted that, if few stakeholders are paying attention to the SA process, there needs to be a way that IESO informs all interested stakeholders that the IESO was planning to recommend an IRRP not be undertaken and that should occur before the SA engagement is undertaken (i.e., don't rely on typical process).
- ◆ OEB staff noted it was obvious a consensus would not be reached and many of the same points had been reiterated a number of times. It was also close to the end of the meeting and another recommendation still needed to be discussed.

In the regional planning process, make information available related to existing hydro capacity that is not being utilized (i.e., spillage) after a process is implemented to collect that information:

- ◆ OEB staff discussed some of the issues associated with this recommendation in noting that OPG has already agreed to make almost all of the desired “spillage” information available to stakeholders as part of the Settlement Agreement in the current case. If the OEB Panel approves the Settlement Agreement, it becomes part of an OEB Decision that covers the next 5 years.

- ◆ A member involved in the OPG hearing noted the Settlement Agreement had recently been approved verbally by the OEB Panel.
- ◆ This recommendation is therefore focused on OPG's remaining small hydro stations which OPG does not closely monitor because OPG has concluded it's not worth the cost.
- ◆ OEB staff added that the IESO has said that they have no plans to deviate from their current planning approach and use such "spillage" information for regional planning purposes. IESO will continue to use its standard assumption for regions in the north -- how much water would be spilled under drought conditions.
- ◆ OEB staff noted, since this information will not be used for regional planning purposes, it is not within the RPPAG's scope and the RPPAG is therefore not the avenue to try and obtain such information. Since it is an OPG related issue, the appropriate OEB process is the next OPG case.
- ◆ OEB staff added that a concern is retaining this recommendation could distract the OEB from the other RPPAG recommendations that are within scope.
- ◆ The member proposing this recommendation had technical difficulties calling into the meeting and was not able to respond to the issues identified by OEB staff during the meeting. It was therefore agreed he would be given an opportunity to speak to it at the next RPPAG meeting.

- ◆ *Note: These meeting notes do not attempt to provide a full detailed discussion of all the RPPAG member feedback on each recommendation. The track changes reflected in the revised table that was circulated to the group with on September 16th attempts to summarize that discussion (e.g., where the group landed, remaining concerns, etc.).*

3. Next Steps and Action Items

- OEB staff noted the next meeting will focus on finalizing the RPPAG Recommendations ("IESO-related" and "Other") and discuss the format of the document setting out the recommendations that will be submitted by the RPPAG members for review by the OEB Executive team.
- OEB staff also identified that the next meeting would be held the week of September 21st.

Action Items (OEB staff):

1. OEB staff will the table setting out the revised RPPAG recommendations and circulate it to the members for review and discussion at the next meeting. It will reflect feedback on the "IESO related" recommendations during this meeting



as well as the additional “Other” recommendations that RPPAG members have suggested be considered by the group. It will be a track change version of the table, so the changes are easy to identify.

Action Items (RPPAG Members):

1. Riaz Shaikh (Alectra) to take the lead on drafting a brief document setting out the type of municipal planning information that is needed for electricity planning for the group to review. Other members -- Ajay Garg (HONI), and Amber Crawford (AMO) -- volunteered to assist.
2. IESO to discuss internally what types of information they are comfortable with releasing that goes beyond the pilot project commitment and will report back to the group at a future RPPAG meeting.

Next RPPAG Meeting: September 21, 2021