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April 29, 2022

Ms. Nancy Marconi  
Registrar  
Ontario Energy Board  
27<sup>th</sup> Floor, 2300 Yonge Street  
Toronto, ON M4P 1E4

Sent by Email to: [registrar@oeb.ca](mailto:registrar@oeb.ca)

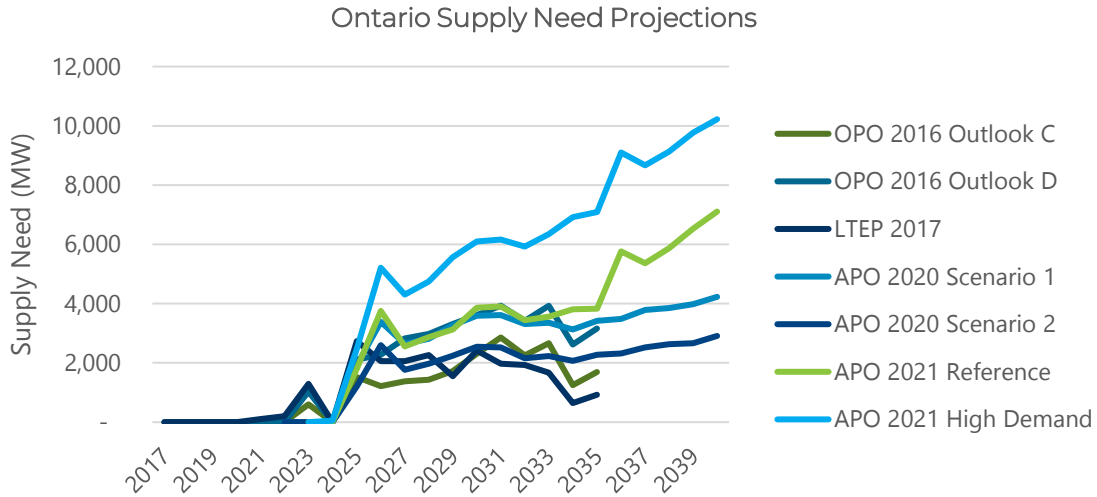
**Re: Submission to the IESO's Revised Issues List  
IESO's 2022 Expenditure and Revenue Requirement Submission (EB-2022-0002)**

Dear Ms. Marconi:

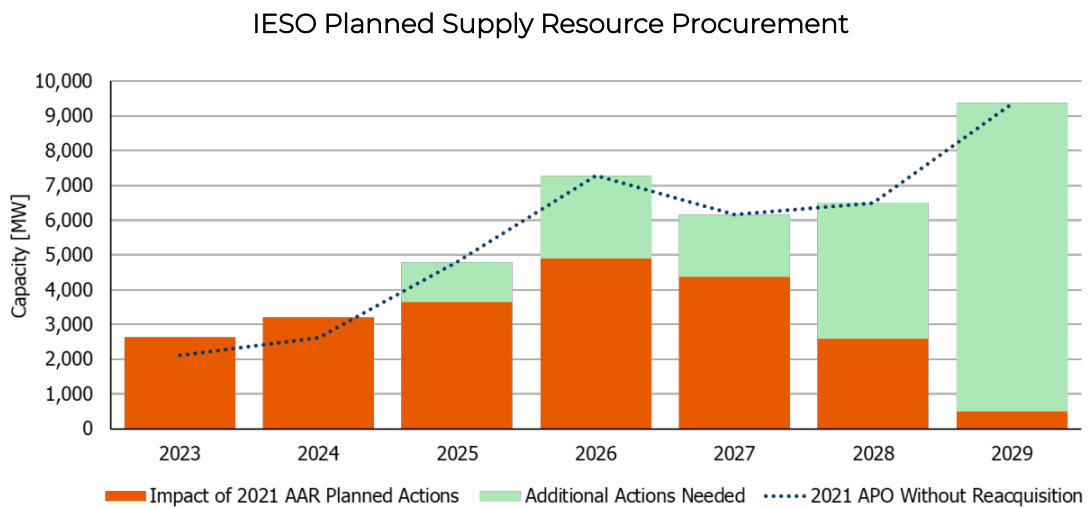
As you know, Power Advisory has been retained to represent the Canadian Renewable Energy Association (CanREA), Energy Storage Canada (ESC) and Ontario Waterpower Association (OWA), collectively referred to as REASCWA, in the IESO's application before the Ontario Energy Board seeking approval for its proposed 2022 expenditure and revenue requirement.

Within the context of REASCWA's review of the draft Issues List, REASCWA notes that Ontario's supply needs have significantly increased since the IESO's previous expenditure and revenue requirement submissions.

With every subsequent IESO forecast from 2016 to 2021, as shown within the graphic below, Ontario's supply needs have significantly increased. Towards addressing these significant supply needs, as recently as April 2022, the IESO announced supply resource procurement plans to address some of these supply needs. This is shown within the second graphic below.



Sources: IESO Ontario Planning Outlook (OPO), IESO Annual Planning Outlook (APO), Ontario Government Long-Term Energy Plan (LTEP)



Source: IESO Annual Acquisition Report (April 2022)

With these forecast supply needs and supply resource procurements in mind, REASCWA proposes the following changes to the draft Issues List.

1. REASCWA proposes that an additional question be added under the Market Renewal Program issue:
  - 4.5 Are the scope, timing, costs, and net benefits of the overall MRP project still appropriate given the IESO's forecast of significant increases in supply needs and the IESO's proposed procurement plans to secure needed supply resources?

2. REASCWA proposes that a sixth issue category be added as follows:

**Planned Supply Resource Procurements to meet Supply Needs**

- 6a: Is the IESO's OMA budget for supply resource procurements sufficient to address the expanded supply needs that have been identified by the IESO since the Business Plan was filed with the Minister of Energy?
- 6b: Given the increasing supply gap and the ability of energy storage, hybrid energy resources, renewable energy resources, and distributed energy resources to help meet supply needs, is the budget allocated to applicable IESO initiatives sufficient to accelerate the implementation of these resources?
- 6c: Given the expected need for new supply resource project development and investment, is the IESO's OMA allocation to support System Impact Assessments and other requirements for supply resources to connect to the grid sufficient?

Given the recent IESO announcements regarding new and needed supply targets and additional procurement mechanisms to meet those targets, we believe there is reason to include the proposed additions.

Sincerely,

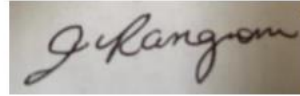


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cc:



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