

RE: Solar PV submission - staff comments

From: "Coker, Meaghan (ENERGY)" <meaghan.coker@ontario.ca>
To: "Feenstra, Mike (ENERGY)" <mike.feenstra@ontario.ca>
Cc: "Whittington, Matt (ENERGY)" <matt.whittington@ontario.ca>
Date: Tue, 24 Apr 2018 15:06:28 -0400
Attachments: Assessment Note -Green Ontario- Solar v11.CRED.DOCX (170.27 kB)

Thank Mike! Attached is Ministry's proposed edits to the assessment note.

From what I know, we sent back 3 minute edits:

Ministry asked for these 2 additional minutes to be added:

- Direct the Ministry to continue to work with the Ministry of Energy related to the Solar Technologies Incentives Program on minimizing impacts to the electricity system and to non-participating ratepayers.
- Direct the Ministry to report back to TB/MBC, prior to Green Ontario Fund entering into any participation agreements with program applicants related to the solar technologies incentives program, with details on how the program has been designed to minimize electricity system and non-participating ratepayer impacts and to align with new consumer protection measures under Ontario's net metering regulatory framework.

And I asked for an edit on this existing line, to specify involvement on the indigenous communities pilot.

- Direct the Ministry to continue to work with the Ministry of Energy ~~related to Solar Technology Incentives Program~~ and the Ministry of Indigenous Relations and Reconciliation related to the Indigenous Communities Pilot.

From: Feenstra, Mike (ENERGY)
Sent: April-24-18 8:53 AM
To: Coker, Meaghan (ENERGY)
Cc: Whittington, Matt (ENERGY)
Subject: Re: Solar PV submission - staff comments

Thanks, Meghan.

Would suggest we share the comments with MOECC MO, but not expecting it will do much to change their sub or presentation at TB today.

M

Mike Feenstra
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Office of the Hon. Glenn Thibeault, Minister of Energy
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On Apr 23, 2018, at 4:53 PM, Coker, Meaghan (ENERGY) <Meaghan.Coker@ontario.ca> wrote:

Mike – below are some comments from staff on MOECC's submission. I don't think these have been shared with MOECC.

However - at this point, I just think it would be helpful to be part of the coms roll-out on both – the solar incentives (TB sub does include off-grid incentive btw) and the FN communities pilot projects.

Also would like to add on - status of previous discussion on replacement subsidy/solution for diesel-reliant communities experiencing Cap & Trade costs.

Do you think we set-up a discussion with MOECC MO? Happy to start the email with Jen and Raf (Comms).

Thanks!
Meaghan

From: Kolodziej, Monika (ENERGY)

Sent: April-20-18 5:42 PM

To: Coker, Meaghan (ENERGY)

Cc: Whittington, Matt (ENERGY); Schlaepfer, Martin (ENERGY); Chatterjee, Jeet (ENERGY)

Subject: Solar PV submission - staff comments

Hi Meaghan,

As requested, here are CRED and SNAP's observations on MOECC's Solar PV submission.

CRED comments below:

- Regarding consumer protection, the submission notes that “MOECC and the Green Ontario Fund have worked closely with the IESO and the Ministry of Energy to build in measures that ensure consumer protection, based on their experiences delivering the FIT and micro-FIT programs” (page 9, section 4.1, paragraph 2). To our knowledge, MOECC has not proposed consumer protection measures that are significantly different from those that existed under micro-FIT. While MOECC and, for that matter ENERGY, believe that partnering with LDCs will help mitigation consumer protection concerns, until details on program design/delivery are available, stating that they have worked to build in measures that ensure consumer protection may be overstated.
- Regarding connection constraint, the submission notes that “there may be concern in some areas where connectivity to the grid is limited by a current (limited-term) over-supply situation” (page 19, section 4.2, para 2). This mischaracterizes the reasons for constraints since areas of constraint are not primarily driven by oversupply at the bulk level, but rather more typically due to local capacity issues which will not necessarily be addressed on the same timelines as any bulk level “over-supply situation”.

SNAP comments below:

- Programs should reflect GHGs avoided as well as system impact which is not apparent from the eligibility rules described.

- The program should be targeting to installations that offset natural gas, oil or propane rather than electricity. Electricity from the grid is more than 90% emissions free and reducing electrical load increases costs for everyone else.
- If programs will nevertheless target the electricity grid, incentives should reflect local electricity system considerations. In areas of the province with more generation than electrical load, solar installations would increase transmission congestion and could increase costs to ratepayers as existing generation could need to be curtailed. In areas with growing electrical demand on the other hand, incentives could be higher to reflect the benefits of offsetting GHGs as well as additional system benefits, such as deferring or offsetting distribution investment requirements. Installations could be coordinated with IESO's regional planning process, LDC distribution system planning and community energy planning in order to maximize value of the solar installations.
- Where communities are diesel reliant, there are certainly opportunities to significantly reduce emissions. However, Ontario's electricity system is very low in GHG emissions, and so it would be helpful to understand the rationale for investing in solar generation for electricity on homes and businesses and also in First Nations such as Wikwemikong that are connected to the provincial grid.
- On p.14, the submission refers to Indigenous communities as a "stakeholder group" which is not consistent with the way we refer to Indigenous communities in general.
- It would be worth noting, for completeness, that 4 of the 6 Indigenous "pilot projects" are already receiving funding through the Small Communities Fund to develop solar microgrids (Lac Des Mille Lacs First Nation, Wikwemikong Unceded First Nation, Oneida Nation of the Thames and Taykwa Tagamou Nation).

I was hoping to get clarification on your comment related to the off-grid option. It appears to be in the submission.

Thanks,
Monika