Feedback Form

Bulk Planning Update Webinar (Eastern Ontario Bulk Plan) – September 30, 2025

Feedback Provided by:

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To promote transparency, feedback submitted will be posted on this engagement webpage unless otherwise requested by the sender.

Following the Bulk Planning Update Webinar held on September 30, 2025, the Independent Electricity System Operator (IESO) is seeking feedback. A copy of the presentations as well as recordings of the sessions, can be accessed from the engagement web page.

Please submit feedback to engagement@ieso.ca by October 31, 2025.

Topic	Feedback
What other information should be considered in the examination of bulk system needs to supply Ottawa?	ORA's 19 June 2025 IESO feedback on this subject was quite extensive and I urge you to also refer to it. Consequently, rather than being repetitive, I will keep this short. In October 2024, the provincial government officially set out the goal of becoming an "Energy Superpower" in its energy strategy. It stands to reason that the plot on slide 6 showing a 15% increase in electricity demand forecast between 2024 and 2025 is as a result of that declaration, rather than an actual increase in projected demand. It was a huge increase in forecasted energy needs in just one year. In October 2025 many reports indicate that Canada is in a period of significant economic slow-down with risks of recession. Consequently, there are uncertainties about the immediate and long-term future. In addition, billion dollar deals with Stellantis and Nexstar are causing even more uncertainty. Do we really want to jump the gun with additional hydroelectric projects that would commit the province to funding the planning of these boondoggle projects in such an uncertain climate? Especially when the province is proposing legislation to place partnering Indigenous' up-front planning costs on the shoulders of ratepayers? Why are solar and wind--the lowest-cost, quickest-to-deploy, and most scalable clean-energy technologies, being sidelined over the next 15 years, while investment continues to flow into hydropower, with its long lead-time, expensive and ecologically damaging hydropower projects? Henvey Inlet First Nation's wind installation is a stellar example to follow! ORA urges the IESO to reassess its assumption that procuring new electricity generation in eastern Ontario should include hydropower. This is inconsistent with the province's own climate objectives and its Ontario Provincial Climate Change Impact Assessment (2023), which warns

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	that "*changes in Ontario's climate are expected to continue at unprecedented rates… posing indirect threats to water availability and water quality*." ORA strongly urges the IESO to first ensure electricity supply adequacy. If needed, build a reliable and adequate electricity supply over the long-term by building a robust transmission system, increase solar, wind, battery storage, conservation and other appropriate non-emitting and emerging technologies for electricity procurement in Ontario. Hydroelectric reservoirs fuel climate change. Their impoundments emit significant amounts of methane throughout the entire lifecycle of the dam, driven by decomposition of organic matter in anaerobic conditions. It is important to note that the life expectancy of a dam is 100 years or more, and that means that any new or reconstructed/refurbished dam and reservoir will emit copious amounts of methane throughout its entire lifecycle. Recent independent peer-reviewed studies (e.g., **DelSontro et al., 2018**; **Beaulieu et al, 2020**; **Scherer & Pfister, 2016**) demonstrate that reservoir methane emissions can rival or exceed those coming from thermal/natural gas facilities over a 20-year horizon. Moreover, dam-related freshwater warming, eutrophication, sediment retention, and methyl-mercury accumulation in fish threatens cold water ecosystems and Indigenous communities that rely on fish as a main staple in their diet. You can turn off a gas-fired facility, but you cannot turn off the methane coming from a reservoir until the dam is removed. Contrary to the misleading greenwashed rhetoric of the hydropower industry and the province, hydropower is not clean, non-emitting, or renewable, as it carries a multitude of negative environmental impacts that are generally not addressed. In addition, it is good to see that the IESO recognizes that hydropower is an energy-limited resource—not just at night when headponds are refilling, but also during summer drought conditions when air conditioners are ramping up and water levels are low. ORA can list many more negatives with hydropower, than there are positives.

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	So, instead of energy-limited and costly new or expanded hydropower, the IESO should model the least expensive solution, including: • Solar microgrids, small-scale community wind projects, and hybrid renewable portfolios paired with modern energy storage systems (battery or compressed air). • Transmission infrastructure reinforcement and redundancy to unlock existing capacity without new or enlarged impoundments. • Industrial demand management, electrification efficiency, and conservation-first approaches. All bulk planning options should be weighed against lifecycle GHG emission accounting and watershed impacts.
What feedback do you have regarding any of the proposed transmission options to enhance supply to Belleville?	ORA strongly supports transmission reinforcement as a preferred alternative to new hydro generation.
What other information should be considered in the continued development of these solutions leading up to the recommendations?	The IESO should release its full non-wires vs. wires comparative analysis, including GHG emissions, lifecycle costs, and resilience metrics. Reliability objectives can be met more sustainably through expanded transmission, distributed solar and wind, energy efficiency, battery and thermal storage, and smart grid management.

Thank you for this opportunity to comment!

Linda Heron, Chair
Ontario Rivers Alliance