

Feedback Form

Bulk Planning Update Webinar (North of Sudbury Bulk Plan) – September 30, 2025

Feedback Provided by:

Name: Linda Heron

Title: Chair

Organization: Ontario Rivers Alliance (ORA)

Email: [REDACTED]

Date: 30 October 2025

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.

North of Sudbury Bulk Plan

Topic	Feedback
What other information should be considered in the examination of needs and potential options?	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 for remote and north of Sudbury projects! ORA urges the IESO to reassess its assumption that procuring new electricity generation north of Sudbury should include hydropower in the Moose River Basin. This is inconsistent with the province’s own climate objectives and

Topic	Feedback
	its Ontario Provincial Climate Change Impact Assessment (2023), which warns that “<i>changes in Ontario’s climate are expected to continue at unprecedented rates... posing indirect threats to water availability and water quality.</i>” 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

Topic	Feedback
	ramping up and water levels are low. ORA can list many more negatives with hydropower, than there are positives. Building new hydropower facilities north of Sudbury doesn't make sense when you can't transmit the electricity south where it is really needed. So, instead of energy-limited and costly new or expanded hydropower, the IESO should model the least expensive solution, including: • Indigenous-led 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 other information should be considered in the continued development of solutions leading up to the recommendations?	The IESO and the province must ensure that Free, Prior, and Informed Consent (FPIC) from Indigenous communities is not undermined by economic pressure, a lack of disclosure of the negative effects or a scarcity of alternatives. Ontario Power Generation and the Ontario Waterpower Association are marketing equity partnerships in hydropower and related storage projects as economic lifelines for remote communities. While ORA supports Indigenous prosperity, such participation should not come at the expense of environmental values or long-term liabilities. The IESO/Province should: 1. Provide independent, community-controlled capacity funding for legal, technical, and environmental reviews not tied to any specific project. 2. Present non-hydro alternatives side-by-side—solar, wind, community storage, and efficiency so communities can make informed decisions. Solar and wind along with battery storage are scalable, cheaper to construct, and can be up and running much faster than hydropower. In addition, a new report from the climate think-tank Ember reveals that

Topic	Feedback
	in the first half of 2025 the world’s solar farms generated more electricity than coal plants for the first time. Solar output surged nearly 30% year-on-year and met 83% of global electricity demand growth. 3. Require lifecycle GHG and water quality disclosure details for any generation option considered. 4. Limit new pumped storage development to closed-loop (off-river) sites on already disturbed lands. 5. Require upfront decommissioning and environmental damages funds to prevent stranded or unsafe infrastructure. This approach ensures Indigenous communities are not pressured into compromising their values and can pursue sustainable, self-directed energy sovereignty consistent with climate and cultural resilience.

General Comments/Feedback

ORA strongly opposes any planning scenario that presumes new or expanded hydropower. Ontario’s rivers are already struggling with unprecedented drought, low flows, and degraded water quality. Instead of more hydropower, we should focus on key mitigation measures, such as dam removal and fish passage, to make our rivers and habitats more resilient to a warming climate. Unfortunately, the province plans to burden Ontario’s rivers with additional ecological disruption in the face of this existential threat. In fact, hydropower is actually fueling climate change.

The province and IESO must prioritize grid modernization, clean distributed renewables such as solar and wind, battery storage, emerging technologies, and climate resilience. The province should be ensuring Indigenous prosperity through clean, community-owned energy systems that respect ecological and cultural values.

ORA supports Indigenous economic development grounded in their traditional values as the foundation for equity participation and ensuring prosperity without ecological compromise.

True energy sovereignty must empower communities to protect rivers that are the lifeblood of their lands, cultures, and futures — while sustaining identity, food, and resilience for generations to come. This will enable long-term climate and economic resilience.

Thank you for this opportunity to comment!

Linda Heron, Chair
Ontario Rivers Alliance