Feedback Form

Bulk Planning Update Webinar (South and Central Ontario Bulk Plan) – December 12, 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 December 12, 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 January 23 2026.

South and Central Ontario Bulk Plan

Topic	Feedback
What additional information would you need to understand the value and approach of the energy studies?	1. Page 40 of the Presentation[1] lists the Backbone Projects for Portfolio A, please provide the backbone projects for Portfolios B and C. Assuming Portfolios A-C and the list of Backbone Projects for Portfolio A (outlined on pp 37-40) are based on the 2025 APO demand forecast, (a) what additional projects would be required in the near term to meet the 2026 APO high-demand scenario? (b) how would the energy modelling time for Portfolio A Backbone Projects (p 40) change under the 2026 APO high-demand scenario? (c) how would the energy modelling time for Backbone Projects associated with Portfolios B and C, change under the 2026 APO high-demand scenario? 2. Page 29 of the Presentation lists the objectives of the South and Central Bulk Study. Objective #3 is "Determining transmission required to enable reliable supply under various long-term high growth/ economic development/ electrification scenarios within key growth areas: • Greater Toronto Area • Windsor to Hamilton corridor" Please explain how the bulk planning is meeting Objective #3 (p. 29). 3. Page 34 lists a key area of feedback for the Bulk Planning as "reducing development time." Please explain if and how the bulk planning is incorporating this feedback. especially in regard to high growth scenarios.

[1] Quarterly Bulk Update Eastern Ontario Bulk Study South and Central Bulk Study, Dec 12, 2025, p. 40. https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/bulk-planning/BP-20251212-presentation.pdf

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What feedback do you have regarding the proposed transmission recommendations at Milton TS, Kleinburg TS, and the Bowmanville to Cherrywood upgrade, required to enable load growth in the GTA and new generation in eastern Ontario?	For the reasons set out in the General Comments below, the PWU recommends that the IESO plan, at a minimum, to consider each of these projects in the context of a high-demand scenario. Re the Bowmanville to Cherrywood upgrade (Presentation, pp 52-55), the PWU has already submitted comments to the Ministry of Energy and Mines that are supportive of the Bowmanville to GTA Transmission Line. We are also generally supportive of the IESO's Bowmanville SS towards Parkway TS Upgrade Refined Draft Recommendation (including submarine HVDC) and will submit comments to the Ministry to this effect in February. This refined draft demonstrates the importance of being proactive in bulk planning and making the large and significant infrastructure investments needed to meet higher demand for Ontario (and the GTA specifically). The PWU agrees with the IESO's assessment provided in the webinar (especially 53:00 to 55:00 and Presentation pp. 42-43) that bulk planning for the GTA is particularly challenging, due to both high demand (concentrated and growing) and limited supply limitations (difficult environment to build new energy infrastructure). The PWU's preliminary assessment is that the submarine HVDC appears to be a preferred solution to address high demand growth in the GTA.
What additional information should we consider as we continue developing the portfolio of options leading up to the final recommendations?	Page 29 lists the objectives of the South and Central Bulk Study. Objective #2 is "Determining transmission required to enable decreased reliance on emitting resources." Given the forecast supply gap, the PWU recommends building sufficient transmission capacity to meet high-growth demand. It is possible that sufficient capacity will be built to eventually enable decreased reliance on these emitting resources (i.e. operating them less, which will reduce emissions). But the PWU cautions against prematurely retiring the emitting resources, which provide necessary insurance in the face of Ontario's looming capacity crunch. On pages 33, 47, and 48, the Presentation mentions Bruce C as a longer-term supply option. Given the importance of planning for high-demand scenarios (as discussed in the General Comments) as well as the need to reduce development time (to meet the imminent higher demand),

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	the PWU suggests that the IESO consider how the bulk plan would change if the Bruce C in-service date were to be advanced. More generally, the IESO could also consider how the bulk plan would change if the proposed Backbone Projects (associated with Portfolios A, B and C) were to be advanced to meet a significantly higher growth scenario (e.g. a growth forecast of 200% by 2050, see General Comments).

General Comments/Feedback

The PWU recommends that bulk planning should accommodate a high growth scenario (as per the Priority 4 in Priorities for Ontario's Integrated Energy Planning, in Energy for Generations, p. 119). Moreover, the PWU's analyses have concluded that the demand forecast should be substantially higher than the high-growth demand forecast referenced in Energy for Generations, as well as the 2025 and 2026 APO Demand Scenarios illustrated on page 6 of the Presentation[2] associated with the South and Central Ontario Bulk Planning Study. In our view, the current APO forecasts significantly underestimate the scale and urgency of Ontario's electrification required to avert an electricity crisis and support economic growth.

This chronic underestimation of Ontario's electricity demand has important implications for bulk planning and robustness of the grid as demand increases. Page 7 of the December 2025 Presentation illustrates the Energy Adequacy Outlook under the 2025 APO forecast, which does not include a high-demand scenario. Even under this lower forecast, a huge gap between supply and demand opens up from 2030 onward. Consequently, significant transmission capacity will also be required rapidly to integrate all the needed supply. Given the looming capacity crunch, greater transmission capacity will also be required to improve the robustness of the grid, so that supply anywhere in the province can serve demand anywhere in the province.

In a series of discussion papers published in 2024, the PWU has elaborated on the emerging risks facing Ontario's electricity system and better ways to meet Ontario's growing electricity demand. Each of the discussion papers highlighted reliability, affordability and deliverability risks respectively. PWU's January 2025 summary of these discussion papers[3] emphasized that the reliance on the IESO's conservatively low demand forecasts is exacerbating these risks at a time when Ontario is facing an electricity crisis driven by rapidly growing demand. As illustrated in the January 2025

[2] Ibid, p. 6.

[3] Power Workers' Union (PWU), Ontario's Electricity System's Risks and Mitigation – A Recap and Taking Stock, January 2025. https://www.pwu.ca/ontarios-electricity-systems-risks-and-mitigation-a-recap-and-taking-stock/

summary,[4] there is a significant planning gap between the PWU's current Consensus electricity growth forecast of 200% by 2050 and the IESO's 2025 APO forecast of 75%. We note that there is an even greater planning gap between the PWU's forecast of 200% and the more recent 2026 APO forecast of 65%. **Therefore, the PWU is concerned that the Bulk Planning for South and Central Ontario (as outlined in the December 2025 Presentation) is not based on sufficiently high-growth demand scenarios, and as such does not consider the proposed projects (including the Backbone Projects) in the context of possible higher-demand scenarios.**

In Ontario's current high demand growth environment, the costs/risks of underbuilding transmission assets are much higher than the costs/risks of right-sizing (or upsizing). Therefore, the IESO should prioritize the development of greater transmission assets capacity as soon as possible to alleviate potential future constraints under a higher demand growth forecast.

[4] Ibid, Illustrative Demand and Supply Growth Chart – Ontario, p. 4.