Feedback Form

South and Central Bulk Planning Update Webinar

Feedback Provided by:

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To promote transparency, the submitted feedback will be posted on the South and Central Bulk Plan engagement webpage unless otherwise requested by the sender.

The Independent Electricity System Operator (IESO) is seeking feedback following the April 30, 2026, presentation of the draft recommendations for South and Central Bulk Plan. A copy of the presentations as well as recordings of the sessions are available on the engagement web page.

Please submit feedback to engagement@ieso.ca by May 21, 2026.

South and Central Bulk Plan - Feedback

The April 30, 2026, webinar focused on the draft South and Central Bulk Plan recommendations as presented. With the plan objectives and scope established, we are seeking feedback on clarity, understanding, and considerations important to note as the plan moves toward finalization.

Question	Feedback
What additional data or context would help provide more clarity and for consideration in the final report?	See General Comments/Feedback
What questions or concerns do you have about the draft recommendations that the IESO might consider in future planning activities?	See General Comments/Feedback
What additional data or local considerations should the IESO be aware of in finalizing the draft recommendations, or for future planning?	See General Comments/Feedback

General Comments/Feedback

The feedback in this section is responsive to the above three specific topics and questions. These issues are interrelated and broadly relevant, and are therefore presented together.

As elaborated below, the PWU continues to be very concerned that IESO Planning Processes (including both Bulk Planning for South and Central Ontario and related Regional Electricity Planning (notably in the GTA East and West Regions) are not based on sufficiently high-growth demand scenarios, and therefore may not result in the level of planning and infrastructure needed to ensure reliability under higher-demand scenarios.

The Presentation[1] explains that the Quarterly Bulk Update: South and Central Bulk Plan, April 30, 2026 is shaped by the ongoing Engagement Process, including IESO Responses to the

[1] Quarterly Bulk Update: South and Central Bulk Plan, April 30, 2026, especially pp. 19, 50-56. https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/bulk-planning/scbp-20260430-presentation.pdf The discussion of Feedback and Responses – by Theme in the Presentation (pp. 51-56) is (in part) based on and summarizes the more detailed and specific Feedback and IESO Reponses, March 6, 2026. https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/bulk-planning/Q4-2025-SouthCentral-Bulk-Update-Response-to-Feedback.pdf

feedback previously provided by PWU and other Participants. The feedback previously provided by PWU is resubmitted in the footnote below for reference.[2]

As preamble for more specific feedback set out below, we will first repeat and summarize some key aspects of the feedback previously provided on South and Central Ontario Bulk Planning, since this feedback is especially relevant to (and reinforced by) the April 30, 2026 Quarterly Bulk Update, as well as related Regional Electricity Planning.

Current IESO demand forecasts significantly underestimate the scale and urgency of Ontario's electrification required to avert an electricity crisis and support economic growth. This systematic underestimation of Ontario's electricity demand has material implications for system planning, resulting in a grid that is less robust and less prepared for emerging demand pressures.

In Ontario's current high demand growth environment, the costs/risks of underbuilding electricity infrastructure are much higher than the costs/risks of right-sizing (or upsizing) infrastructure. Planning should therefore prioritize sufficient and timely capacity to accommodate high-growth scenarios, rather than optimizing narrowly around central forecasts.

Page 8 of the Presentation provides a graphic of the Electricity Demand Long-Term Outlook. This Outlook is a central input and driver for the entire Bulk Planning process.

The Electricity Demand Long-Term Outlook incorporates three 2026 APO scenarios:

- Reference
- High Demand
- Low Demand.

However, major components of the analyses underlying South and Central Bulk Planning are still based on the 2025 APO, which provided only a Reference Scenario demand forecast.

As explained in the Presentation (pp. 25-29, 47-49), the IESO developed three distinct portfolios of bulk transmission options. These three portfolios were evaluated with energy modelling (a production cost model) based on 2025 APO (which provides only a Reference Scenario demand forecast.

Nonetheless, the Best-Performing option was Portfolio B, which had the highest Upfront Capital Cost (most extensive expansion of transmission infrastructure). Portfolio B provided consistently better performance, across a wide variety of criteria:

- most improvements in electricity supply and regional coordination
- most improved operability through key system interfaces

[2] Bulk Planning Update Webinar (South and Central Ontario Bulk Plan) – December 12, 2025, Feedback of the Power Workers' Union, January 23, 2026 https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/bulk-planning/scbp-20251212-feedback-form-Power-Workers-Union.pdf

- lowest impact of total corridor and station loss in major events
- highest system benefits under different generation scenarios
- no expressed concerns in feedback.

The consistently better performance of Portfolio B helps to vividly demonstrate the feedback that the PWU has been repeatedly providing:

- **the costs/risks of underbuilding electricity infrastructure are much higher than the costs/risks of right-sizing (or upsizing) infrastructure**
- **Ontario electricity infrastructure must be expanded rapidly and at scale to meet accelerating demand.**

The PWU is very supportive that Bulk Planning for South and Central Ontario has now, to some extent, begun to incorporate consideration of a High Growth Scenario. This positive evolution in electricity planning for South and Central Ontario is long overdue and further highlights the PWU's ongoing concerns that IESO Planning Processes continue to be largely (and sometimes solely) based on a Reference Scenario. It is especially notable (and problematic) that Regional Electricity Planning for some areas of South and Central Ontario (such as GTA West) are still based solely on a Reference Scenario, rather than also incorporating a High Growth Scenario.[3]

As extensively documented in the Presentation (especially pp. 17-29, 35-42), the South and Central Bulk Plan vividly demonstrates that the scale and urgency of infrastructure growth required in South and Central Ontario is particularly intense (greater than provincial averages):

- electricity demand is growing very rapidly, due to a strong convergence of multiple growth factors, including:
    - population and economic growth
    - residential, commercial, industrial and other development
    - electrification (of both buildings and vehicles)
- electricity demand is forecasted to grow faster in South and Central Ontario (particularly between Windsor and Hamilton and in GTA) than in other areas of the province, and actual growth could be much higher than now forecasted
    - Kitchener-Waterloo-Cambridge-Guelph regional electricity demand is growing rapidly with an average annual increase of 4% over the long term, compared to the IESO's 2026 Annual Planning Outlook's average annual increase of 2.1% between 2027-2050 (Presentation, p. 40).

[3] Regional Electricity Planning in the GTA West Region – April 2, 2026, Feedback of the Power Workers' Union, April 23, 2026, p. 3. https://www.ieso.ca/-/media/Files/IESO/Document-Library/regional-planning/GTA-West/gta-west-20260402-feedback-form-PWU.pdf

    - Electricity demand in the London Area is projected to grow by 130% over the next 20 years. This rapid increase is primarily driven by industrial and residential growth (Presentation, p. 41).
    - Electricity demand in the Windsor-Essex region is expected to more than double by 2043, due to multiple growth factors including greenhouse expansion (Presentation, pp. 39, 42).

- The APO High-Demand and Reference Scenarios generally lack ambition and vision. They are heavily based on a continuation of current BAU (Business as Usual) policies and technologies. These scenarios have limited if any consideration of potential large-scale customers, such as data centres. The exclusion of these less certain – but increasingly likely – large loads (particularly transmission-connected loads) risks systematically understating future demand requirements. This approach is not sufficient for Ontario electricity planning, especially for a forecast period out to 2050, in a period of rapid change and high uncertainties. In particular, this approach will underestimate potential electricity demand, for the Reference scenario and especially for the High-Demand scenario.[4]
- as extensively documented in the Presentation (especially pp. 24-42), additional capacity is required throughout the South and Central Ontario transmission system:
    - at locations throughout the area
    - throughout the planning period out to 2050.
- the needs for expanded electricity infrastructure are immediate, urgent and ongoing
    - existing infrastructure will have constraints in the near- to medium-term
    - large-scale, long-term upgrades such as new transmission lines and transformer stations are required and essential, but take time (7-10 years) to plan, design, and construct
- as strongly emphasized in the Presentation (p. 10, 54), transmission infrastructure is essential, including for energy transition
    - a robust transmission system not only moves power, but also plays a key role in enabling the future power system
    - transmission is essential to

[4] See sources including:
- Presentation, p. 51
- 2026 Annual Planning Outlook – April 21, 2026, Feedback of the Power Workers' Union, May 5, 2026. https://ieso.ca/-/media/Files/IESO/Document-Library/engage/apo/2026/APO2026-20260421-Feedback-PWU.pdf
- extensive discussion of data centres (and analogies to earlier growth in greenhouses) in the 2026 Annual Planning Outlook – April 21, 2026 Webinar (especially 50:00 to 1:02:00), and Regional Electricity Planning in the GTA West Region – April 2, 2026, Feedback of the Power Workers' Union, April 23, 2026, p. 3. https://www.ieso.ca/-/media/Files/IESO/Document-Library/regional-planning/GTA-West/gta-west-20260402-feedback-form-PWU.pdf

        - deliver new and refurbished generation to where electricity is needed
        - unlock future supply and local connections without over-reliance on local emitting generation
        - provide flexibility and resilience across a range of future demand and supply outcomes
        - enable economic growth and electrification across broad geographic regions
    - Non-Wire Alternatives (NWAs) are considered as part of the planning framework; however, bulk-level demand and nuclear-scale generation require high-capacity transmission; NWA are complementary and transitional, not substitutes for major bulk reinforcements.

Based on all of the above, it is very clear that:

- Electricity infrastructure serving South and Central Ontario must be expanded rapidly and at scale to meet accelerating demand.
- This area (and all of Ontario) is already in a catch-up position, reflecting earlier planning that systematically underestimated rapidly growing electricity demand.

The PWU is very supportive that Bulk Planning for South and Central Ontario has now begun to facilitate faster development of transmission infrastructure. This positive evolution in electricity planning for South and Central Ontario is long overdue, and major additional changes are still required, including to be effectively responsive to government policies and direction.

As noted in the Presentation (p. 18):

- the South and Central Bulk Plan builds on assumptions in the IESO APOs and Pathways to Decarbonization Report
- these assumptions were also supplemented by government policies and direction through specific planning documents such as Powering Ontario's Growth plan and the more recent Energy for Generations: Ontario's Integrated Energy Plan that have underscored the importance of early planning activities to maintain a reliable and affordable supply of electricity.

IESO has now identified two Early Actions to accelerate the pace of future upgrades (Presentation, pp. 20, 53). This is a good beginning, but more still needs to be done.

As explained in the Presentation (pp. 30, 44), eligibility of projects for Transmission Selection Framework (TSF) should be conditional based on timing and need of projects:

- Implementation-Ready projects should not be eligible for TSF; these projects are:
    - near-term investments to enable growth and reliability

    - reinforcements required across multiple planning scenarios with defined near-term need dates
    - should proceed to development and implementation
- Future-Ready Development projects may be eligible for TSF
- Future-Consideration projects are likely eligible for TSF.

Based on the above-described criteria, the Submarine HVDC transmission line from Bowmanville SS to Hearn SS, recommended by the Toronto Regional Plan, should NOT be eligible for TSF.[5]

[5] See Presentation, pp. 57-58 and Toronto Third Line – April 9, 2026, Feedback of the Power Workers' Union, May 5, 2026. https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/tsf/TTL-20260423-Feedback-Form-PWU.pdf