Feedback Form

Regional Electricity Planning in the Hamilton Area – July 8, 2026

Feedback Provided by:

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

The Independent Electricity System Operator (IESO) is seeking feedback on the Needs and Options Screening presentation. A recording of the presentation can be accessed from the engagement web page.

Please submit feedback to engagement@ieso.ca by **July 22, 2026.**

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Perspectives on the high-level wire and non-wire options screening	After careful review, the City of Hamilton's Office of Climate Change Initiatives has several questions and concerns regarding the IESO process and criteria used for screening wire and non-wire options. To provide context

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	for these concerns, relevant elements of Hamilton's community-wide Climate Action Strategy (HCAS) are shared here. Within the HCAS mitigation plan (the Community Energy & Emissions Plan), Action 14 calls for the City to advocate for and build an electricity grid for the future. The goal is to prioritize local level decarbonization through grid modernization. This requires focusing on the need to support more local renewable energy generation and storage, as well as advocating for the Province to work to ensure that Ontario's electricity grid is as low carbon as possible. --- ***From Hamilton's Climate Action Strategy:*** **ACTION 14 – CEEP - Local level decarbonization priority and creation of a 'next generation' grid.** To achieve greater resilience and flexibility in the electricity grid, the City will coordinate with Alectra, Hydro One, the IESO, and the Province to streamline connections for solar PV, electric vehicles, and energy storage. Strategies can include targeted investments in the grid, streamlined application/permitting, and low-interest financing. Furthermore, building on its November 2020 resolution calling on the Province to phase-out the use of natural gas in its electricity grid by 2030, the City can partner with other municipalities to highlight the imperative for a zero-emissions Provincial grid. • **Long-term electricity plan aligned with a net-zero future and significant local electrification** (e.g., the LRT, commercial and personal EVs, increased solar PV, fuel switching from natural gas furnaces to electric heat pumps, etc.) • Investment by Alectra, Hydro One, IESO, and/or the Province --- The information provided above, combined with our questions and concerns related to information presented by IESO in the July 6 webinar presentation deck, serves to set out our concerns about IESO's approach to wired vs non-wired solutions.

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	COMMENTS & QUESTIONS RELATED TO THE PRESENTATION SLIDES: SLIDE 9: Priorities at distribution level - Are these priorities established only by LDCs? Is there an opportunity for the priorities established by municipalities to be identified also – including climate action priorities – and considered at this level? There are growing concerns at the municipal level regarding distribution priorities and the criteria being used to establish these priorities. SLIDE 12: Q: Who undertakes the evaluation of opportunities for cost-effective non-wires alternatives (NWAs) and wires options to address the needs identified? Is it the Technical Working Group that completes the cost-effectiveness assessment? Where can one find the detailed criteria used in these assessments? Is there an opportunity, as part of this Addendum Study process, to respond to criteria or suggest additional criteria to ensure that municipal priorities are being addressed in these assessments of alternatives? SLIDE 14: In response to the 'NEEDS' category – for the City of Hamilton, energy needs are organized around climate commitments – with Net Zero by 2050 as the desired outcome. Additionally, the municipality is currently undertaking a review and update of Hamilton's Climate Action Strategy and this could result in an acceleration of that Net Zero date to sooner than 2050. In the 'RECOMMENDATIONS' category - What criteria are considered when assessing reliability? Is consideration given to central vs decentralized power supplies and what each can offer to increase the reliability – including the climate resilience - of the overall system? SLIDE 31 – Background – Determining Options The slide describing how options are determined indicates that this includes completing a detailed analysis of screened-in options. Is this the stage where

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	the assessment of cost-effectiveness happens? Is there any evaluation of climate implications - ie. traditional wired vs NWSs and GHG emissions profiles and climate resiliency provided by each option? Are there any requirements for those requesting increased power supply from the grid to pursue energy efficiency measures before coming to the IESO and requesting capacity increases from the centralized grid? SLIDE 32 – KEY CONSIDERATIONS FOR DETERMINING OPTIONS The information provided in this slide suggests that the economic assessment undertaken is not a full life cycle assessment of cost/benefit of different approaches to energy provision. Can the IESO confirm that this is the case? If so, does this mean that climate benefits - and the cost savings these can bring when a full life cycle assessment of costs is undertaken– are not factored into the assessment of renewables and other non-wired solutions as part of the economic evaluation? Under 'community considerations' reference is made to 'resiliency' as something that community values. How is resilience defined in this context? How is resiliency defined by IESO? The OCCI encourages an interpretation of resiliency that includes resilience to climate change and the extreme weather that it brings. A resilient system includes both centralized power generation and decentralized power systems made up of renewables and associated storage systems, as one that is more resilient than one dominated by central power generating facilities. SLIDE 33 – SCREENING STEPS 'Additional Considerations' - 'Take into account local factors that may require further analysis of non-wire alternatives, even if earlier steps haven't identified non-wires alternatives as suitable.' OCCI requests that, as an additional consideration, Hamilton's Climate Action Strategy goal of Net Zero Carbon by 2050 (if not sooner) and any associated actions in HCAS that support these decarbonization efforts required for the community's pathway to net zero, be taken into account.

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	SLIDE 34 – RENEWABLE GENERATION VS WIRE OPTIONS The example provided by IESO – suggesting that huge amounts of land would be required to realize, for instance, adequate solar or wind power generation – seems to be an inadequate justification for dismissing renewable energy generation as a larger piece of the solution to address energy demands. The approach fails to consider what might be realized through IC&I rooftop solar, and programs to facilitate/support residential solar rooftop installations. This does not seem to be a reasonable justification for screening out larger commitments to renewables as a solution for Hamilton! Office of Climate Change Initiatives concerns raised in sections above – around the City's need to prioritize decarbonization and build a more resilient grid are valid municipal needs that should be factored into the assessment of alternatives in a more meaningful manner than what currently appears to be the case. It is also worth recognizing here that a more holistic cost-benefit analysis that includes a full life cycle assessment of alternatives would yield favourable results for low carbon, renewable alternatives. It is also important to recognize that grid emissions factors will continue to undo progress made on local decarbonization over multiple years. This only reinforces the municipal interest in seeing more NWSs to ensure that decarbonization efforts are successful over the coming years. SLIDE 38 – ELECTRICITY INVESTMENT COSTS IESO indicated that approved projects have to be 'just and reasonable' The City of Hamilton OCCI wonders how 'just' and 'reasonable' are defined by IESO in this context. Is there an opportunity for OCCI to share perspectives on how 'just' and 'reasonable' should be defined within the context of electricity investments? SLIDE 43 – NEXT STEPS For non-wire solutions, new resources will be procured through the IESO's Resource Adequacy Framework

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	(e.g., competitive procurements), while new energy efficiency programs would be implemented through the IESO's Conservation and Demand Management Framework. The City of Hamilton's OCCI is very interested in exploring the potential with IESO for these two routes to be used more effectively to help to build the 'next generation grid' envisioned in Hamilton's community-wide Climate Action Strategy.
Additional information that should be considered in the assessment of these options	See responses provided above
Additional information that should be provided in future engagements to help understand perspectives and insights	Click or tap here to enter text.

General Comments/Feedback

In summary, the City of Hamilton's Office of Climate Change Initiatives has fundamental concerns about the low ranking placed on the potential for non-wire solutions and associated storage systems to provide additional energy needs in the community into the future. Questions and concerns are provided above regarding the IESO's process for assessing different energy options. The OCCI is interested in receiving more details and developing a deeper understanding of how assessments are done and if/how climate mitigation and adaptation are carefully considered in these assessments. The need to build more decentralized energy systems is linked to the municipality and broader community's need to decarbonize in order to realize Net Zero Carbon by 2050 as set out in Hamilton's Climate Action Strategy. Decentralization done right can also bring increased energy system resilience - something that becomes more and more important with more frequent extreme weather events.