

Feedback Form

Regional Electricity Planning in the GTA West Region – August 20, 2026

Feedback Provided by:

Name: Brigid Rowan

Title: Senior Economist

Organization: Econalysis Consulting Services on behalf of the PWU

Email: [REDACTED]

Date: September 4, 2026

To promote transparency, feedback submitted will be posted on the GTA West region [engagement webpage](#) unless otherwise requested by the sender.

Following the GTA West regional planning webinar held on August 20, 2026, the Independent Electricity System Operator (IESO) is seeking feedback on draft Integrated Regional Resource Plan (IRRP) recommendations for the region. A copy of the presentation as well as recording of the session can be accessed from the [engagement webpage](#).

Please submit feedback to engagement@ieso.ca by September 4, 2026.

Topic	Feedback
What feedback is there on the detailed options analysis?	See General Comments/Feedback

Topic	Feedback
How can the IESO continue to engage with communities and stakeholders as these recommendations are refined?	See General Comments/Feedback

General Comments/Feedback

The feedback in this section is responsive to the above two 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 Regional Electricity Planning in the GTA West Region and related Bulk Planning for South and Central Ontario) 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 GTA West Webinar #3 Presentation and Recorded Presentation¹ explain that:

- Regional Electricity Planning in the GTA West Region is based on Bulk Planning for South and Central Ontario
- the South and Central Bulk Plan is nearing completion and will soon be released.

The final Report: South and Central Bulk Plan² has now been released.

The PWU has previously provided extensive feedback on GTA West Regional Planning (and related Bulk Planning for South and Central Ontario), which is resubmitted in the footnote below for reference.³

As preamble for more specific feedback set out below, we will first repeat and summarize some key aspects of the feedback previously provided.

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,

¹ GTA West Regional Electricity Planning, Webinar #3: Detailed Options Analysis, August 20, 2026:

- Presentation, especially pp. 9-10, 35-36. <https://www.ieso.ca/-/media/Files/IESO/Document-Library/regional-planning/GTA-West/gta-west-20260820-presentation.pdf>
- Recorded Presentation, especially 14:00 to 18:00 and 57:40 to 1:01:40. <https://youtu.be/tVxeYKSl1jw?si=869AZnSTI-XVzfdI>

² South and Central Bulk Plan, August 20, 2026. <https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/bulk-planning/scbp-20260820-south-and-central-bulk-plan-report.pdf>

³ Regional Electricity Planning in the GTA West Region – April 2, 2026 (Webinar #2), Feedback of the Power Workers Union, April 23, 2026. <https://www.ieso.ca/-/media/Files/IESO/Document-Library/regional-planning/GTA-West/gta-west-20260402-feedback-form-PWU.pdf>
Bulk Planning Update Webinar (South and Central Ontario Bulk Plan) – April 30, 2026, Feedback of the Power Workers Union, June 3, 2026. <https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/bulk-planning/scbp-20260521-feedback-form-PWU.pdf>
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>

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 rightsizing (or upsizing) infrastructure. Planning should therefore prioritize sufficient and timely capacity to accommodate high-growth scenarios, rather than optimizing narrowly around central forecasts.

IESO summarized the PWU's most recent previous feedback on GTA West Regional Planning and responded as follows:⁴

Power Workers Union raised concerns that IESO planning relies too heavily on a reference demand forecast instead of a high-growth scenario that includes additional transmission-connected large loads (such as data centres), risking underbuilt infrastructure and reduced reliability in a rapidly growing demand environment where planning should instead prioritize sufficient, resilient capacity.

IESO Response

[...]

Thank you for your feedback regarding developing scenario planning. To meet the region's needs, the forecast was developed with close coordination between LDCs and the IESO. Both a summer and winter demand forecast were developed, with the winter forecast making additional assumptions for long-term electrification trends which have the potential to drive higher winter peaks. [...]

Regional planning is completed at regular intervals to ensure planning is flexible and responsive to a range of future outcomes. **Future planning cycles will develop a high forecast scenario. Please note, should higher growth materialize, the TWG can discuss whether an accelerated timeline is feasible for regional planning.**

The PWU is very supportive that Regional Planning for GTA West will develop a high forecast scenario in future planning cycles. This positive evolution in electricity planning for GTA West 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.

But it is notable and problematic that this positive evolution in electricity planning has been so limited and slow-moving in GTA West.

As demonstrated by other IESO Planning Processes, it is possible to do more sooner to incorporate and consider high forecast scenarios:

- Regional Planning for GTA East already incorporates a high forecast scenario that supports flexible, resilient planning⁵

⁴ IESO Response to Feedback for Public Webinar #2: Feedback Received and IESO Response June 9, 2026, p. 6, emphasis added. <https://www.ieso.ca/-/media/Files/IESO/Document-Library/regional-planning/GTA-West/gta-west-20260610-IESO-response-to-feedback.pdf>

⁵ GTA East Regional Electricity Planning, Engagement Webinar: Electricity Needs and Options Screening, April 20, 2026, especially pp.13-15. <https://www.ieso.ca/-/media/Files/IESO/Document-Library/regional-planning/GTA-East/GTA-East-20260420-presentation.pdf>
"In the GTA East Regional Plan, three forecast scenarios are being considered. A **reference forecast** based on today's trends and policies, along with **high** and **low** demand scenarios that support flexible, resilient planning. Planning recommendations will primarily be based on the reference forecast, with the high and low scenarios used to inform the potential timing of options."

- Bulk Planning for South and Central Ontario already considers regional high forecast scenarios⁶
 - demand forecasts for GTA West and other regions within South and Central Ontario include (for both winter and summer) a high forecast scenario, as well as a reference forecast:
 - **in Toronto and other regions, the high scenario forecasts are typically very substantially higher than the reference forecasts**
 - **but in GTA West, the high scenario forecasts are only slightly higher than the reference forecasts.**

Especially in the distinctive context of GTA West, it is vitally needed to do more sooner to:

- incorporate and consider meaningful high forecast scenarios
- expand infrastructure to accommodate these high-growth scenarios.

GTA West is the second largest load centre in Ontario, with a particularly important concentration of infrastructure (including Pearson International Airport), population, economic activity, and growth.⁷

Even for GTA West Regional planning based on a Reference Scenario, the scale and urgency of infrastructure growth required in GTA West are massive and particularly intense (even greater than provincial averages), including that:⁸

- the needs for expanded electricity infrastructure are immediate and urgent
 - current infrastructure cannot keep pace, especially in areas that have little or no existing infrastructure
 - large-scale, long-term upgrades such as new transmission lines and transformer stations are required and essential, but take time to plan, design, and construct
 - short-term and medium-term measures (including non-wires solutions) are being explored to help maintain reliability and support growth during the transition until infrastructure can be more fully upgraded; but they cannot substitute for core transmission and distribution infrastructure expansion.

Bulk Planning for South and Central Ontario⁹ also 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 rightsizing (or upsizing) infrastructure**
- **Ontario electricity infrastructure must be expanded rapidly and at scale to meet accelerating demand.**

⁶ South and Central Bulk Plan, August 20, 2026, especially pp. 34-41. <https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/bulk-planning/scbp-20260820-south-and-central-bulk-plan-report.pdf>

⁷ Id. GTA West is contiguous and strongly linked with Toronto, the largest load centre in Ontario.

⁸ For documentation and elaboration, see:

- Presentation, especially, pp. 6, 11-32
- Regional Electricity Planning in the GTA West Region – April 2, 2026 (Webinar #2), Feedback of the Power Workers Union, April 23, 2026, especially pp. 3-4. <https://www.ieso.ca/-/media/Files/IESO/Document-Library/regional-planning/GTA-West/gta-west-20260402-feedback-form-PWU.pdf>

⁹ For documentation and elaboration, see:

- South and Central Bulk Plan, August 20, 2026, especially pp. 82-99. <https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/bulk-planning/scbp-20260820-south-and-central-bulk-plan-report.pdf>
- South and Central Bulk Planning Update Webinar– April 30, 2026, Feedback of the Power Workers Union, June 3, 2026, especially pp. 3-4. <https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/bulk-planning/scbp-20260521-feedback-form-PWU.pdf>

The IESO developed and compared three distinct portfolios of bulk transmission options for South and Central Ontario. The recommended portfolio is 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 including:

- most improvements in electricity supply and regional coordination
- most improved operability through key system interfaces
- lowest impact of total corridor and station loss in major events
- highest system benefits under different generation scenarios
- no expressed concerns in feedback
- lower implementation risk, with less susceptibility to supply chain and labour resources shortages.

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

- Electricity infrastructure serving GTA West must be expanded rapidly and at scale to meet accelerating demand.
- GTA West (and all of Ontario) is already in a catch-up position, reflecting earlier planning that systematically underestimated rapidly growing electricity demand.
- GTA West could remain in a catch-up position far into the future, unless more is done sooner to:
 - incorporate and consider meaningful high forecast scenarios
 - expand infrastructure to accommodate these high-growth scenarios.

The PWU is very supportive that Bulk Planning for South and Central Ontario has now begun to facilitate faster development of transmission infrastructure.¹⁰ This positive evolution in electricity planning is long overdue, and major additional changes are still required, including to be effectively responsive to government policies and direction.

In summary, GTA West Regional Planning confirms that the concerns previously and repeatedly raised by the PWU regarding IESO Planning Processes have not yet been fully and properly addressed. IESO planning processes are not yet consistently grounded in sufficiently robust high-growth demand scenarios, and therefore risk under-delivering the infrastructure required to ensure reliability under plausible future conditions.

¹⁰ Bulk Planning for South and Central Ontario:

- identified transmission projects to be initiated prior to completion of the plan (Early Actions)
- recommended transmission projects that should proceed on a timeline that reflects the urgency and the critical nature of needs, with in-service dates beginning as soon as 2030 and no later than 2034 (Implementation Ready).

See The South and Central South and Central Bulk Plan, August 20, 2026, especially pp. 13-14, 29, 108-110. <https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/bulk-planning/scbp-20260820-south-and-central-bulk-plan-report.pdf>