

# Feedback Form

## Regional Electricity Planning in Greater Ottawa Area – June 9, 2025

### Feedback Provided by:

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Date: June 16, 2025

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

Following the Greater Ottawa electricity planning engagement webinar held on June 9, 2025, the Independent Electricity System Operator (IESO) is seeking feedback on the detailed option analysis and draft recommendations. A copy of the presentation as well as a recording of the session can be accessed from the [engagement web page](#).

**Please submit feedback to [engagement@ieso.ca](mailto:engagement@ieso.ca) by June 30, 2025.**

| Topic  | Feedback                                    |
|--|---|
| What feedback do you have on the draft recommendations?                      | Please see General Comments/Feedback below. |
| What information needs to be considered regarding the draft recommendations? | Please see General Comments/Feedback below. |

| Topic   | Feedback                                    |
|---|---|
| How can the IESO continue to engage with communities and stakeholders as the recommendations are implemented, or to help prepare for the next planning cycle? | Please see General Comments/Feedback below. |

## General Comments/Feedback

Dear Sir/Madam,

Thank you for the opportunity to submit comments on Webinar #3 of the Regional Electric Planning process for Ottawa. Below are my comments, questions, and feedback:

- Transparency – There is a need for greater transparency in the planning process so that we are able to provide more meaningful feedback. For example, we see cost numbers on the slides, but have almost no information as to how costs are arrived at. Consideration of value is just as important as up front cost, yet we do not know what value streams are being taken into account. It is important to understand the assumptions and reasoning behind the conclusions that are being presented.
- Resilience – It would be helpful to hear about how IESO is thinking about resilience – both in terms of how wires options can be constructed in a more resilient way and how non-wires options can be integrated into the system in a way that provides greater resilience to individual customers and the system generally. Also, given the extreme weather that Ottawa is faced with, how is the IESO considering the benefit of resilience in decision making?
- Local Economic Benefits – It would be helpful to hear about how IESO is thinking about the local economic benefits to Ottawa residents of local renewable generation and storage. Less than 6% of the energy consumed in Ottawa is generated in Ottawa.<sup>1</sup> Local renewable energy can benefit Ottawa through local job creation, community ownership of energy production, and for larger systems by adding to the property tax base. Are these benefits being considered by IESO in decision making?
- Land Area Requirements – It would be helpful to have information about how the land area calculation for local generation was conducted. Siting solar on rooftops and above parking lots can optimize space utilization. Additionally, strategically sited energy farms that integrate agriculture with renewable energy can minimize impacts.
  - Were vertical Battery Energy Storage Systems (BESS), which take up less space, considered when calculating the footprint of BESS?
- BESS for Core East – Has IESO done the math on the costs, value streams, and benefits associated with building one or more BESS for core-east with local transmission, sited within the greater limits of the

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<sup>1</sup> CITY OF OTTAWA, ENERGY EVOLUTION – OTTAWA’S COMMUNITY ENERGY TRANSITION STRATEGY 32 (October 2020), [https://documents.ottawa.ca/sites/documents/files/energy\\_evolution\\_strategy\\_en.pdf](https://documents.ottawa.ca/sites/documents/files/energy_evolution_strategy_en.pdf)

city of Ottawa? If so, the details of this information should be shared. If not, perhaps this should be considered.

- Enabling New Solutions – More focus should be given to getting solutions out of pilot and into reality at scale. Accelerating new solutions should be a priority. Other jurisdictions have reduced the red tape associated with interconnection of Distributed Energy Resources and have enabled value streams for front-of-the meter community scale solutions.
- Home Renovation Savings Program – The rebate program for residential solar panels needs to be improved to address program deficiencies. As currently offered, the program prohibits net metering in fine print and unduly restricts system size. Due to these subtle and restrictive program terms, the solar rebate offers negative value to consumers, who may not realize what they are giving up when they agree to accept the rebate.

These solar rebate program restrictions apply for the life of the solar panels (decades). When consumers try to sell their home, they will find that participation in the Home Renovation Savings solar rebate program has encumbered their property. Home buyers will find that they are prohibited from net-metering, despite having no agency in the “choice” of the previous owner. In light of IESO’s critical mission and commitment to ensuring the continued trust and respect of program participants, the structure and presentation of the Home Renovation Savings solar rebate program should be reevaluated.

- Addressing Emissions – Even as climate change worsens, Ontario is sourcing more of its electricity from fossil fuels.<sup>2</sup> Rising greenhouse gas emissions from gas power plants are contributing to the risks of extreme weather and smoke that Ottawans experience.

Ottawans desire an electric system that is reliable, affordable, and environmentally sustainable. Too little has been said in this planning process about the last criterion: environmental sustainability. The City of Ottawa’s Climate Master Plan, approved unanimously by City Council, sets a target of zero greenhouse gas emissions by 2050.<sup>3</sup> Please indicate how the IESO’s draft recommendations will work to reverse the trend toward greater carbon emissions and deliver an environmentally sustainable electric system.

I very much appreciate your careful consideration of the thoughts and suggestions enclosed here. Please let me know if clarification or additional detail is needed or if I might be of assistance in any way.

Thank you,

Aaron Kelly, Esq.

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<sup>2</sup> *Ontario Electricity Produced with Rising Percentage of Greenhouse-Gas-Emitting Power*, THE CANADIAN PRESS (May 14, 2025), <https://www.cbc.ca/news/canada/toronto/ontario-electricity-greenhouse-gas-1.7534474>

<sup>3</sup> CITY OF OTTAWA, *ENERGY EVOLUTION – OTTAWA’S COMMUNITY ENERGY TRANSITION STRATEGY* 72 (October 2020), [https://documents.ottawa.ca/sites/documents/files/energy\\_evolution\\_strategy\\_en.pdf](https://documents.ottawa.ca/sites/documents/files/energy_evolution_strategy_en.pdf)