IESO Response to Feedback

Regional Electricity Planning in the London Area – Forecasting Dec 1, 2025

The IESO hosted a public webinar on December 1, 2025, for the London Area as part of its engagement to inform the development of a long-term electricity plan - Integrated Regional Resource Plan (IRRP). During the webinar, the IESO provided an overview of the regional electricity planning process, shared the draft electricity demand forecast, and draft engagement plan for input. The presentation materials and recorded webinar are available on the engagement webpage.

The IESO appreciates the input, which will be considered by the Technical Working Group[1] to develop the IRRP. Feedback was received from the following parties, and the full submission can be viewed on the engagement webpage:

- Enwave Energy Corporation
- EverGreen Energy Corporation

The section below summarizes feedback received related to recommended solutions to address local needs, as well as local issues and concerns that should be considered in the electricity planning for the London Area electrical region.

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Enwave requests that all IRRPs in areas with existing or potential district energy systems include a scenario evaluating district energy as a lower peak demand and energy consumption alternative to in-building electrification for heating.	Thank you for sharing your feedback. The IESO values the important role that district energy can play in coordinated energy planning to address capacity needs, reduce peak demand, and support decarbonization goals. The TWG does not prepare scenarios on district energy solutions but welcomes your input on how district energy

[1] The Technical Working Group is lead by the IESO and consists of the LDCs in the region and the local transmitter (Entegrus Powerlines Inc., ERTH Power Inc., London Hydro Inc., Tillsonburg Hydro Inc., Hydro One Networks Inc.)

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	can meet the needs in the London Area. As we move into the options analysis phase of the IRRP process, the Technical Working Group (TWG) will evaluate both wire and non-wire solutions to meet the needs of the London Area. We welcome your input on the potential demand and reliability that district energy could supply in the region so it can be further considered as a non-wire option during this analysis.
Suggested solutions to address needs in the London area: Enwave asks the TWG to explore using local generation and DERs, including Enwave's London District Energy (LDE) assets, as non-wires alternatives to address capacity constraints at Nelson TS and other local needs. Enwave asks the TWG to include in their London Area options analysis an assessment of how existing local generation, including Enwave's LDE facility, can further support reliability and system needs identified in the 2025 Scoping Assessment. EverGreen Energy Corp recommended their magnetic generators, waste-to-energy system and energy efficiency to support new operations in London and St. Thomas.	Thank you for your feedback. In the next milestone of the London Area IRRP, the Technical Working Group (TWG) will assess and present the region's unique electricity needs. Once these needs are identified, the TWG will begin evaluating both wire and non-wire solutions. This is an ideal time to provide input on district energy opportunities to ensure they are considered during the options evaluation phase. This analysis will include electricity demand-side management (eDSM) measures, as well as distributed energy resources (DERs), to assess their potential in meeting or deferring transmission requirements in the region. The TWG welcomes additional details on Enwave's London District Energy (LDE) facility to better understand its potential contribution to station needs and overall system reliability. Please feel free to share any supplementary information with us at communityengagement@ieso.ca for further consideration. As part of the regional electricity planning process, the TWG evaluates non-wires options including electricity demand side management (eDSM) opportunities. Waste-to-energy systems are eligible to participate in the IESO's Save on Energy XLerate program for large industrial systems. You can visit the XLerate program webpage for more information on how to apply. However, magnetic generators are out of scope for the IRRP. The IESO encourages EverGreen Energy Corp to work with local communities and municipalities to implement behind the meter energy efficiency solutions. The IESO also recognizes the role eDSM plays in managing electricity demand. Through the IESO eDSM Framework, there are several programs and opportunities to help communities

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	reduce their electricity demand. We encourage you to visit our Save on Energy website for more information on the programs offered.
Enwave requests a meeting with the IESO and TWG about the use of local generation as a non-wires alternative to address local needs.	The IESO welcomes the opportunity to engage with Enwave to explore how local generation and district energy can contribute as non-wire solutions to address system needs in the London Area.
Enwave asks the TWG to specify what information they need from Enwave or other distributed energy resource (DER) operators so these solutions can be fully assessed in the London IRRP.	Thank you for your inquiry. To fully assess the potential of district energy and other DER solutions, the IESO would require detailed technical information, such as feasibility studies, capacity and operational characteristics, and any constraints that may affect deployment. This will help us evaluate their ability to meet local demand and support system reliability.
Enwave requests that the IESO and TWG develop and assess procurement models that enable local generation to serve as non-wires alternatives for transformer station (TS) needs, while ensuring these resources can provide capacity under existing or new contracts.	Thank you for your feedback. The IESO supports the consideration of local generation across the London Area and other IRRP regions as a way to address station capacity needs and potentially defer new transmission infrastructure over the 20-year planning horizon. Regarding your suggestion on procurement models, this falls outside the scope of the London Area IRRP. The IESO will assess the appropriate procurement mechanism for local generation recommendations from an IRRP, which may include existing (e.g. LT2) or new procurements. For clarity, the contribution of existing generation or storage resources would already be considered in IRRP studies. Recently, the Ministry of Energy and Mines released the Integrated Energy Plan (Energy for Generations), which directs the IESO to identify opportunities for new and existing district energy systems and, with the OEB's lead, to advance DER valuation recommendations and explore how to enable distributor-led DER procurements. The IESO looks forward to engaging more to understand opportunities for district energy systems to support the province's broader electricity system needs. In addition, the Ministry of Energy and Mines has directed the IESO to work with the OEB to ensure that LDCs have a

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	clear pathway for funding for designing and delivering local eDSM initiatives that address local distribution constraints and also provide bulk system value.