Feedback Form

Regional Electricity Planning in the Northwest Region – June 11, 2026

Feedback Provided by:

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Date: 1 July 2026

To promote transparency, feedback submitted will be posted on the Northwest region engagement webpage unless otherwise requested by the sender.

Following the Northwest regional planning webinar held on June 11, 2026, the Independent Electricity System Operator (IESO) is seeking feedback on the draft electricity demand forecast scenarios and Engagement Plan. 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 July 2, 2026.

Topic	Feedback
What additional information, if any, should be incorporated in the proposed scenarios? How can the proposed scenarios best capture the range and uncertainty of growth potential while informing near-term infrastructure investments?	Tag every identified need and draft recommendation to the scenario that drives it, and publish the ratepayer cost exposure under the reference and low cases, not only the high case. Because the reference forecast rests on mining loads the IESO's own Scoping Assessment calls sensitive to commodity prices and financing, the scenarios should be probability-weighted and paired with clear signposts and staged, deferrable investment off-ramps, so near-term decisions are not locked to growth that may not arrive. The IESO should also use the low scenario, as it has said it will, to set the timing of needs. (See General Comments, Section 2.)
What areas of concern or interest about electricity should be considered as part of the planning process?	Two: protecting ratepayers and using sound supply assumptions. Transmission sized to speculative, finite mining loads exposes ratepayers to stranded-asset cost, so non-wires options, wind, solar, and battery energy storage systems, should be carried forward for remote communities and to stage transmission. The forecast should not credit energy-limited northern hydroelectric generation at full output, consistent with the IESO's own North of Sudbury findings, and should be climate-stress-tested against multi-year drought. (See General Comments, Sections 1 and 3.)
What information is important to provide to participants throughout this engagement?	Publicly release the Northern Ontario Connection Study, which bears directly on the non-wires question, and confirm it tests non-wires options on an equal footing with transmission. Provide written responses to the major concerns raised at each stage, as the IESO has done on recent engagements, and disclose option costs on a like-for-like basis, both net and gross, so communities and ratepayers can evaluate the trade-offs. (See General Comments, Section 4.)
Does the proposed Engagement Plan provide sufficient scope and opportunities for input?	Largely, but it should be strengthened in two ways: a standing commitment to written responses to major written concerns, and a clear channel for First Nation local-access concerns, such as those raised at the June 11 webinar, where new transmission runs through a community's territory without serving its own load or development. (See General Comments, Section 4.)

General Comments/Feedback

The Ontario Rivers Alliance (ORA) is a not-for-profit grassroots organization with a mission to protect, conserve, and restore Ontario rivers. ORA advocates for effective policy and legislation to ensure that development affecting Ontario rivers is environmentally and socially sustainable.

During the June 11 webinar, ORA asked why wind, solar, and battery energy storage systems (BESS) could not supply some remote communities directly, rather than waiting on long transmission builds, when those resources are cheaper, cleaner, and faster to deploy. The IESO answered that this is "exactly the kind of options and considerations this planning process is meant to consider," and confirmed that such supply resources "can certainly be done in a shorter timeframe" and "are a key aspect to helping address some of those more near-term needs" for remote communities.[1] ORA welcomes that answer and writes to ensure it is carried into the demand forecast, the scenarios, and the plan that follows.

ORA's comments are directed to the two interests at the core of the IESO's mandate: a reliable supply and the protection of ratepayers. We do not ask the IESO to step outside that mandate. We ask it to plan the Northwest on firm need, honest scenario disclosure, and the least-cost, least-regret resources its own analysis already supports.

1. Carry Non-Wires Alternatives Forward for Remote Communities

The IRRP is the planning vehicle that is meant to consider a broad range of options, including non-wires alternatives. ORA asks the IESO to hold to that purpose in the Northwest. Several large transmission builds are already underway or contemplated for the region: the $1.2 billion dollar Waasigan line, in service between 2026 and 2027,[2] the Red Lake line north of Dryden, a 230 kV double-circuit build that nearly quadruples the area's capacity, roughly 400 MW, and is expected in the early 2030s,[3] a planned 230 kV line toward the Greenstone area, and the recently completed East-West Tie at about $777 million.[4] The IESO has not published a cost estimate for the Red Lake line, though it almost certainly holds one; CBC reports it at $830 million.[3] For scale, the province's new Barrie-to-Sudbury bulk line is estimated at $1.4 to $1.6 billion.[3] These are multi-billion-dollar commitments. A wind, solar, and battery storage package sized to a remote community's need costs a fraction of a long transmission build and can be deployed far sooner, so communities are not left waiting years for power that a local resource could deliver

The IESO's own Hybrid Resource Equivalency Assessment (August 2025) found that wind, solar, and battery storage portfolios can meet 99.5 to 99.98 percent of peak load and 100 percent of base load with high reliability, at costs competitive with gas and small modular reactors.[2] That finding applies directly to the Northwest. The forecast and scenario design should expressly preserve a non-wires pathway, both to supply remote communities and to stage or defer transmission where a wind, solar, and BESS portfolio can do the work. Where the Northern Ontario Connection Study is being relied upon, non-wires options should be tested against transmission on an equal footing, not treated as a secondary check.

Local generation also answers an equity concern voiced at the June 11 webinar. New transmission is being built through First Nation territory to serve loads elsewhere, while the host community cannot access much of that capacity. Wind, solar, and battery storage sited at or near a community lets it use

the resource directly and opens ownership and economic-development opportunities that a line passing through does not.

ORA Recommendation 1: That the IESO carry forward a non-wires pathway, wind, solar, and battery energy storage systems for remote communities and for staging or deferring transmission, and evaluate those resources on the firm-capacity basis established by the IESO's own Hybrid Resource Equivalency Assessment.

2. Scenario Integrity and Stranded-Asset Risk to Ratepayers

The draft forecast shows Northwest winter demand growing by 73 percent, and by as much as 137 percent in the high scenario, over the next 20 years, with the growth driven overwhelmingly by new mining loads. The IESO puts the reference 2044 winter peak at 1,636 MW.[1] The IESO's own Scoping Assessment describes this as "resource-based industrial demand, which is sensitive to commodity prices and financing conditions."[3] That sensitivity is the heart of the ratepayer risk. A reference case built on mining projects "most likely to connect" is still a bet on a commodity cycle, and the high scenario expressly carries "more schedule uncertainty." If transmission is sized to that growth and the loads slip or shrink, ratepayers carry the cost of infrastructure they did not need.

The risk does not end if the mines proceed. Mining projects are finite, commonly on the order of 40 years. When a mine closes, purpose-built transmission becomes a stranded asset that ratepayers still pay for. Wind, solar, and BESS, by contrast, are modular, removable, and redeployable, and Ontario already requires a Decommissioning Plan Report for utility-scale wind and solar that sets out how the site is dismantled and the land and water restored.[4] Reservoir hydroelectricity, the resource the Province continues to promote for the North, carries no decommissioning provision and is cost-prohibitive to remove. A least-regret plan favours resources that can be scaled back or relocated when the load that justified them is gone.

ORA also places on the record that the draft forecast is aligned to the 2026 Annual Planning Outlook and the Province's "energy superpower" growth assumptions. Procuring transmission and supply above firm regional need shifts cost and risk onto ratepayers. ORA notes the contradiction in the Minister's own words: in a June 23, 2026 interview, he called the IESO "a truly independent agency" while, in the same interview, dismissing the analysis showing renewables and storage to be cost-competitive, the IESO's own Hybrid Resource Equivalency Assessment, as one that does "not paint an intellectually honest picture."[8] The IESO's evidence cannot be authoritative when it suits the Province's plan and unreliable when it does not. Sound regional planning should rest on the IESO's evidence, transparently disclosed, not on a political or provincial growth target.

ORA Recommendation 2: That the IESO tag every identified need and draft recommendation to the demand scenario driving it, and disclose the ratepayer cost exposure if demand tracks the reference or low case rather than the high case.

ORA Recommendation 3: That the IESO build explicit signposts and staged, deferrable investment off-ramps into the plan, so ratepayers are not committed to long-lived transmission for loads that may not materialize or that end when a finite mining project closes.

3. Reliability and Existing-Generation Assumptions

A credible forecast depends on credible supply assumptions, and the Northwest leans heavily on hydroelectric generation that the IESO itself describes as energy-limited. At the May 20, 2026 North of Sudbury webinar, the IESO stated that "a large share of supply resources in the area is hydroelectric, which is energy-limited and cannot be relied on at full output in all hours," and that "hydroelectric supply resources are energy-limited and cannot be relied on to meet demand in all hours or conditions."[5] The same constraint applies in the Northwest: much of this hydro is river-based with limited storage, so output falls overnight while headponds refill, exactly when wind generation is strongest. The 2015 North of Dryden IRRP reached the same conclusion, finding northern hydroelectric generation has significantly reduced output during drought.[6] A forecast that credits this hydro at full output understates the real need and mis-sizes the build.

The supply side should also be climate-stress-tested. Ontario's own climate science classifies electricity generation infrastructure as highest-risk across all future periods,[7] and the hydrological record bears this out: Statistics Canada has documented falling hydroelectric output in successive dry years,[8] and Manitoba Hydro reported roughly 220 million dollars in drought losses across two recent fiscal years.[9] [10] Where existing resources such as the Atikokan Generating Station are assumed available, the contract terms and expiry dates behind those assumptions should be stated plainly so the forecast can be tested. ORA reserves its fuller comments on new hydroelectric generation for the options and recommendations stage of this IRRP.

ORA Recommendation 4: That the IESO not credit energy-limited northern hydroelectric generation at full output in its supply assumptions, and that it climate-stress-test the forecast against multi-year drought, consistent with its own North of Sudbury findings and Ontario's climate science.

4. Engagement Plan

ORA commends the IESO's recent practice of responding to stakeholder comments on its engagements, including the Long Lead-Time and LT2 processes. That responsiveness builds trust and should be a standing feature of this IRRP. ORA asks the IESO to formalize it here by providing written responses to the major concerns raised in writing during each stage of the Northwest plan.

Two further points go to the adequacy of the Engagement Plan. First, the Northern Ontario Connection Study bears directly on the non-wires question in Section 1, yet it has not been publicly released. ORA asks the IESO to release it and to confirm that it tests non-wires alternatives on an equal footing with transmission. Second, First Nation communities raised local-access concerns at the June 11 webinar, including that new transmission runs through their territory without serving their own load or development. The Engagement Plan should provide a clear channel for those concerns and address them on the record.

ORA Recommendation 5: That the IESO formalize its recent practice of responding to stakeholder comments by providing written responses to major concerns in this IRRP, publicly release the Northern Ontario Connection Study and confirm it tests non-wires alternatives on an equal footing, and provide a clear channel for First Nation local-access concerns.

The Northwest plan will commit ratepayers for decades. ORA asks the IESO to build it on firm need, honest scenario disclosure, and the least-cost, least-regret resources its own analysis already endorses, wind, solar, and battery storage, rather than locking the region into transmission sized to

speculative growth. Doing so protects ratepayers, serves remote and First Nation communities sooner, and keeps faith with the IESO's mandate for a reliable and affordable electricity system.

Thank you for the opportunity to comment.

Respectfully submitted,

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End Notes

1 *IESO. Northwestern Ontario Regional Electricity Planning, Webinar #1: Draft Demand Forecast and Scenarios. June 11, 2026. https://ieso.ca/-/media/Files/IESO/Document-Library/regional-planning/Northwest-Ontario/nw-ontario-20260611-presentation.pdf*

2 *CBC News. Hydro One breaks ground on $1.2-billion Waasigan Transmission Line. November 2025. https://www.cbc.ca/news/canada/thunder-bay/waasigan-line-groundbreaking-1.7391087*

3 *CBC News. Powering the north: Why Ontario wants to fast-track transmission lines in northern Ontario. 2026. https://www.cbc.ca/news/canada/sudbury/northern-ontario-power-grid-9.7201822*

4 *Daily Commercial News. $777-million northwestern Ontario transmission line project works begin (East-West Tie). November 2019. https://canada.constructconnect.com/dcn/news/infrastructure/2019/11/777-million-northwestern-ontario-transmission-line-project-works-begin*

5 *IESO. Hybrid Resource Equivalency Assessment. August 2025. https://ieso.ca/-/media/Files/IESO/Document-Library/Technical-papers/Hybrid-Resource-Equivalency-Assessment.pdf*

6 *IESO. Northwest Ontario Region Scoping Assessment Outcome Report. September 19, 2025. https://www.ieso.ca/-/media/Files/IESO/Document-Library/regional-planning/Northwest-Ontario/nw-ontario-scoping-assessment-outcome-report.pdf*

7 *Renewable Energy Approvals under Part V.0.1 of the Environmental Protection Act, O. Reg. 359/09 (Decommissioning Plan Report, Table 1, item 3). https://www.ontario.ca/laws/regulation/090359*

8 *Hon. Stephen Lecce, Minister of Energy and Mines (Ontario). Interview, CBC News, Power & Politics Podcast, June 23, 2026. https://www.cbc.ca/listen/cbc-podcasts/123-power-and-politics/episode/16222493-several-first-nations-to-own-a-nuclear-reactor-in-ontario*

9 *IESO. North of Sudbury Bulk Plan, Update Webinar Presentation, slides 24 and 30. May 20, 2026. https://ieso.ca/-/media/Files/IESO/Document-Library/engage/bulk-planning/nsbp-20260520-presentation.pdf*

10 *OPA/IESO. North of Dryden Integrated Regional Resource Plan. January 27, 2015. http://www.noma.on.ca/upload/documents/north-of-dryden-report-2015-01-27.pdf*

11 *Ontario Ministry of the Environment, Conservation and Parks. Ontario Provincial Climate Change Impact Assessment, Technical Report. 2023. https://www.ontario.ca/files/2023-11/mecp-ontario-provincial-climate-change-impact-assessment-en-2023-11-21.pdf*

12 *Statistics Canada. Dry weather dampens overall generation: Electricity year in review, 2024. May 15, 2025. https://www.statcan.gc.ca/o1/en/plus/8076-dry-weather-dampens-overall-generation-electricity-year-review-2024*

13 *Manitoba Hydro. Manitoba Hydro posts $63 million loss due to drought: 2024-25 Annual Report. September 2025. https://www.hydro.mb.ca/articles/2025/09/manitoba-hydro-posts-63-million-loss-due-to-drought-2024-25-annual-report/*

14 *Manitoba Hydro. Manitoba Hydro posts $157 million net loss due to drought: 2023-24 Annual Report. October 2024. https://www.hydro.mb.ca/articles/2024/10/manitoba-hydro-posts-157-million-net-loss-due-to-drought-2023-24-annual-report/*