OREC feedback on IESO Regional Electricity Planning in the Peterborough to Kingston Region – July 29, 2026

Feedback Provided by:

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Email: [redacted] Date: August 6, 2026

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

Following the Peterborough to Kingston regional planning webinar held on July 29, 2026, the Independent Electricity System Operator (IESO) is seeking feedback on identified needs and options screening 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 August 12, 2026.

Topic	Feedback
What feedback do you have on the screening of wire and non-wire options?	No mention of third-party non-wire options. Assumption seems to be that LDC's will install a number of large batteries (most likely at transmission stations, close to TX interties).
What additional information should be considered in the evaluation of wire and non-wire options?	There was no mention of electricity cost sensitivity or worldwide technology cost trends, &/or efficiency trends. There was also no mention of the potential generation capacity that will come from the Local Generation Program or distribution connected LT and MT projects; or third-party non-wire solutions.
Are there any additional information that should be provided in future engagements to help understand municipal perspectives and insights?	Every LDC should present a yearly report on the percentage of local demand that is met by local generation. This should be updated bi-annually. This will give the public, planners and LDC an indication of local resiliency levels.

General Comments/Feedback

As this is an IRRP planning process to cover the next 20 years, it would be appropriate to place more emphasis on international technology and consumer behaviour changes that have taken place over the last five to fifteen years. It can be expected that the next 20 years will see an acceleration of the trends over the past 10 years; especially what is happening in higher cost jurisdictions.

Distributed Energy Resources (DER) technologies have all dropped in cost and exploded in implementation around the world; especially where regulations have encouraged their implementation. Consumers everywhere are looking for options to reduce costs and improve resiliency while electrifying transportation and HVAC. However, Ontario regulations are encumbered with a bias in favour of utilities spending on capital assets that can be 'rate-based'. As rationale economic actors it is normal for utilities to want to spend the maximum possible. Unfortunately, this behaviour leads to overspending and the potential for serious levels of stranded assets (and higher taxes).

The IRRP planning process makes no comment on regulatory restrictions.

Regulations in Ontario can and should be changed ASAP and the IRRP planning cycle should assume that a minimum level of DER generation is achieved in 5 yrs, 10yrs, 15 and 20yrs. See the OREC recommendations posted here: https://www.orec.ca/post/advancing-community-owned-renewable-energy-in-ontario

Retail customers in Ontario are sheltered against rising costs by the Ontario Electricity Rebate, provided to EVERY retail customer (irrespective of means) as a 23.5% taxpayer funded rebate. This effectively induces demand growth; thereby generating extra generation, transmission and distribution costs. At some point in the coming 20years this $7Billion++ annual subsidy will be removed, leading to a sudden price shock; and likely a dramatic increase in net-metering interest; along with batteries, conservation, etc. Ignoring this possibility is a material risk to the validity of the IRRP study.

The Ontario Energy Board has designed an incentive program for LDC's to enable (and benefit from) third-party owned non-wire solutions. There is no mention of this in the IRRP plan.

The IESO has announced that in 2027 they will be starting 'Phase 1' of the new Local Generation Program (recontracting of the original FIT contracts), and then 'Phase 2' in 2028 (contract awards for NEW renewable generation on the distribution grid). These contracting phases will happen annually until at least 2038. There is no mention of how much new generation will be added to the distribution grid by these procurements, or how much FIT 'expired' generation is expected to be removed from the grid. These are material considerations and locationally very important.

An area of special focus should be the modernization of interconnection requirements to more easily accept and integrate renewables of every type into the distribution grid. Especially in areas where there are existing but underutilized interconnection points (a policy known as Surplus Interconnection Service at existing Points of Interconnection (POIs), FERC order No 845/845-A).

The rest of the world has higher electricity costs, and fewer generation options than Ontario, therefore their businesses and citizens are operating in relatively higher cost environments. This is driving energy efficiency into all manner of end products and services. This is the main reason why energy demand growth has been consistently below forecasts across North America for the last 35 years (as we have

computerized everything!) The worldwide trend to efficiency will not slow down; even as we further electrify our economy. We certainly need more energy, but we especially need it closer to the actual demand; which is on the distribution grid (where people and businesses live, work and play.

OREC believes that there are two major oversights in the IRRP plan; there is more generation capability and more conservation potential, on the local distribution system, than is presented. And most importantly, that a serious effort to harness these world-wide trends will reduce the costs of the grid significantly while adding to its resiliency.