

Feedback Form

Regional Electricity Planning in South Georgian Bay/Muskoka – November 4, 2025

Feedback Provided by:

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Date: November 5, 2025

To promote transparency, feedback submitted will be posted on the [South Georgian Bay/Muskoka engagement webpage](#) unless otherwise requested by the sender.

The Independent Electricity System Operator (IESO) is seeking feedback on the scoping assessment report. A copy of the report and a recording of the webinar can be accessed from the [engagement web page](#).

Please submit feedback to engagement@ieso.ca by November 18, 2025.

Topic	Feedback
What additional information should be considered as part of the Scoping Assessment?	The Scoping Assessment should also consider the full lifecycle impacts, performance degradation, and system integration challenges of battery energy storage systems

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	(non-wire alternatives) to ensure reliable, efficient, and sustainable grid operation.
What additional considerations, informed by local developments, should be taken into account for the areas identified as needing further analysis?	In regards to BESS: Additional considerations should include confirming that proposed developments are located in areas served by full-time fire services and connected to municipal water systems rather than relying on tanker shuttles. The assessment should also evaluate the adequacy of local infrastructure—such as road networks and hydrant capacity—to support emergency response and fire flow requirements. Shared service agreements between municipalities should be reviewed to understand their impacts on response times, mutual aid capacity, and long-term operating costs. Furthermore, planning should ensure that fire protection capacity aligns with anticipated community growth and land-use objectives, avoids siting in or near areas of elevated wildland fire risk, and incorporates climate resilience measures such as vegetation management and defensible space. Clear and equitable cost-sharing mechanisms should be identified to fund any required infrastructure or service enhancements. Finally, the presence of an existing solar array on a property should not, on its own, be considered sufficient justification for IESO support or approval of additional energy projects without full assessment of local conditions and service adequacy.
What other areas or specific considerations should be examined through regional planning?	Regional planning should acknowledge and support the infrastructure needs of Hydro One and the broader provincial system; however, it is equally critical that the IESO work closely with municipalities to address local challenges and risks associated with proposed developments. Municipal councils often face significant uncertainty when asked to pass resolutions of support without full awareness of potential impacts—particularly those related to technologies such as lithium-based battery energy storage systems. The regional planning process should therefore emphasize open, transparent communication, ensuring that municipalities receive clear, accessible information about safety, environmental, and infrastructure considerations before decisions are made. This collaborative and informed approach will help balance

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	provincial energy objectives with local capacity, public safety, and community confidence.

General Comments/Feedback

IESO should adopt a coordinated, transparent, and safety-focused approach that balances provincial energy objectives with municipal capacity and community well-being. While acknowledging the infrastructure needs of Hydro One and the broader grid, it is essential that the IESO work collaboratively with municipalities to address on-the-ground challenges related to emergency services, infrastructure readiness, and land-use compatibility. Developments should only be considered in areas with access to full-time fire protection and municipal water systems, avoiding reliance on tanker shuttles or siting in high wildland fire risk zones. Shared services agreements and cost-sharing frameworks between municipalities should be carefully evaluated to ensure equitable, sustainable support for required infrastructure upgrades. The IESO should require that Battery Energy Storage System (BESS) projects obtain building permits, even though they are not currently classified as buildings under the Ontario Building Code (OBC). Given the significant structural, electrical, and fire safety considerations associated with BESS installations—including containment systems, foundation requirements, ventilation, and proximity to critical infrastructure—municipal building permit oversight is essential to ensure compliance with local safety standards and land-use regulations. Requiring a building permit would provide a consistent review process to verify that sites are appropriately designed, constructed, and inspected for risks such as thermal runaway, hazardous material containment, and emergency access, thereby enhancing public safety and supporting municipal accountability. The presence of existing renewable energy infrastructure—such as solar arrays—should not automatically constitute justification for additional projects without a full assessment of local risks and service adequacy. Moreover, as technologies such as lithium-based battery energy storage systems are introduced, municipalities must be provided with clear, accessible information regarding safety, environmental, and operational considerations. Transparent engagement and early communication are critical to ensure councils and communities fully understand proposed infrastructure before resolutions of support are requested. Regional planning should also consider cumulative impacts on transportation networks, long-term maintenance demands, and climate resilience measures such as vegetation management and defensible space. By prioritizing collaboration, transparency, and public safety, the IESO can strengthen trust with municipalities while advancing a reliable, resilient, and sustainable energy system.