Feedback Form

Regional Electricity Planning in the Sudbury/Algoma Area – December 18, 2025

Feedback Provided by:

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Date: 12 January 2026

To promote transparency, feedback submitted will be posted on the Sudbury/Algoma 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 **January 12, 2026.**

Topic	Feedback
What additional information should be considered as part of the Scoping Assessment?	The ORA supports the Scoping Assessment; however, it should be strengthened with additional baseline information and explicit assumptions.

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	First, **climate change and hydrology must be treated as core planning variables** (not generic context). The Assessment should clearly state whether its 'extreme weather' demand cases incorporate projected warming, increasing storm/ice-storm risk, and changing seasonal peaks, and it should explicitly assess increasing climate-driven hydrology risk to existing hydroelectric generation (energy-limited output, drought/low flow risk, higher evaporation, and operational constraints). Second, provide a transparent inventory of **river-connected generation and its real dependable capacity**, including seasonal energy limits and operating mode (peaking vs. run-of-river). Third, disclose the forecast load drivers and confidence levels (firm vs. speculative industrial/mining loads), with clear 'decision triggers' (e.g., contracted load, environmental approvals, municipal permissions) to prevent premature wires expansion for non-committed projects. Finally, **environmental, water, and Indigenous rights constraints must be embedded as screening criteria** within the IRRP scope—so **options that would create new river impacts are screened out early**, rather than pushed forward and 'consulted' after decisions are effectively made.
What additional considerations, informed by local developments, should be taken into account for the areas identified as requiring further analysis?	Further analysis must reflect current local realities and risk. **Demand growth appears strongly tied to large industrial prospects**; the IRRP must treat these as scenario-based and test slow/no-growth cases **to avoid stranded assets and unjustified ratepayer costs**. Existing **northern hydro resources** in this region are **hydrologically constrained and energy-limited**; they should not be treated as firm, on-demand capacity without empirical dependable-capacity analysis (particularly under climate-driven low-flow and heat extremes). Municipal land-use authority (Official Plans, natural heritage systems, climate plans) must be integrated into assumptions—**municipalities can refuse support resolutions** and land-use permissions **where projects conflict with local ecological or climate priorities**.

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	Indigenous communities with treaty territories and traditional land uses must be engaged early, resourced, and meaningfully, with the explicit objective of identifying solutions that avoid new impacts to waterways and rights.
What other areas or specific considerations should be examined through regional planning?	Regional planning should explicitly examine several additional areas. First, a 'non-wires first' portfolio approach: conservation, demand response, distributed generation, storage, and targeted distribution reinforcements should be evaluated as primary solutions, with a high evidentiary threshold before recommending new transmission. Second, local resilience under extreme weather: assess microgrids and resiliency measures for critical services (water/wastewater, hospitals, emergency services, remote communities) and examine trends in outage frequency/duration as climate-resilience indicators. Third, establish environmental safeguards: the IRRP should explicitly exclude new hydropower/reservoir expansion as a climate solution due to cumulative river impacts (flow alteration, fish habitat fragmentation, methylmercury risk, and reservoir methane), and prioritize genuinely low-impact resources (efficiency, wind/solar paired with battery storage, and other non-dam technologies where appropriate). Finally, because this region is also a bulk transmission corridor, the IRRP should evaluate upstream/downstream interactions and cumulative corridor impacts on waterways, wetlands, and Indigenous lands, with avoidance as the first principle.

ORA General Comments/Feedback

IESO's Sudbury/Algoma Scoping Assessment must explicitly project system risks and resource viability into the future, rather than relying on "historical" hydrology and stable climate assumptions that no longer apply. Ontario is already experiencing worsening extreme heat, heightened risk of prolonged drought, reduced summer low flows, flashier storm events, and increased evaporation losses. These are not abstract climate projections—they are emerging conditions that directly affect electricity demand (especially peak cooling loads) and simultaneously reduce the dependability of surface-water-dependent generation.

Hydroelectric generation is, by definition, a water-limited resource. The hotter and drier conditions Ontario is projected to experience will make hydropower **less reliable precisely when demand is highest**, while also increasing competition for finite water supplies across communities, ecosystems, and industry.

The Province's own 2023 *Ontario Climate Change Impact Assessment*[1] warns that climate change is intensifying heat extremes and hydrologic volatility and will increase risks to water resources and watershed resilience—meaning, IESO must treat water security and river health as binding constraints in regional electricity planning, not as side issues. IESO's own planning reports from 2015 to 2025 repeatedly state that hydropower in the north is an energy-limited, intermittent and unreliable resource and does not recommend it—instead, the recommendation was to construct new transmission lines. These water shortfalls will only worsen as climate change progresses.

ORA urges IESO to explicitly future-proof this Scoping Assessment by extending its analysis to mid-century climate conditions and by assessing whether proposed supply options—including hydropower—remain viable and responsible under increasingly extreme heat, drought risk, and hydrologic instability.

IESO should therefore avoid framing hydropower as the default "clean" solution for northern grid needs. Regional planning must be technology-neutral, climate-resilient, and aligned with least-impact pathways. This means prioritizing **demand-side management and conservation first**, then rapidly deployable **solar, wind, and battery storage**, including community-scale microgrids and hybrid systems suited to northern conditions. These options are now proven and scalable, can reduce diesel dependence, and improve local energy security—without further degrading rivers, wetlands, fish habitat, and the watershed functions that climate resilience depends on.

Continuing to push hydroelectric expansion (particularly projects involving new dams, headponds, or peaking operations) creates a long-term environmental liability and a climate vulnerability—locking communities into water-dependent generation at the exact time when climate change is making water increasingly scarce and variable. IESO should assess distributed renewables and storage as core alternatives in Sudbury/Algoma, not as afterthoughts, and should evaluate them against hydropower using a full-life-cycle cost lens that includes cumulative effects, river fragmentation, Indigenous rights, and long-term climate and water security risks.

Finally, ORA remains deeply concerned that Ontario's current policy direction continues to treat new hydropower as a "fast-track" or presumptively beneficial option, despite a substantial body of evidence showing that hydroelectric projects—particularly those involving headponds, and peaking operations—cause persistent and cumulative harm to rivers and watershed integrity.

These impacts include altered flow regimes, erosion and sediment disruption, fish injury and mortality, habitat fragmentation, warming and oxygen depletion, methylmercury risks, wetland loss, and long-term degradation of ecological function, all of which are magnified under climate change and cannot be mitigated away through narrow, project-by-project permitting.

Calling hydropower "non-emitting" because it doesn't burn fossil fuels is the ultimate climate disinformation: reservoirs emit greenhouse gases, especially methane. A major global synthesis found that reservoir water surfaces emit about **0.8 (0.5–1.2) gigatonnes CO_2-equivalent per year**[2], meaning "non-emitting hydropower" is factually false and misleads communities and decision-makers.

This messaging is particularly damaging in northern and Indigenous contexts. Indigenous Nations and remote communities are repeatedly presented with hydropower as a "clean, non-emitting solution," while material evidence is omitted: reservoirs can be major sources of GHG emissions, and the ecological harms to fish, water quality, wetlands, and river integrity are persistent, cumulative, and

often irreversible. This is not informed consent. It is the strategic withholding of critical information while advancing a predetermined infrastructure agenda. IESO is not a neutral actor in this narrative — it is complicit in disseminating claims that mislead Indigenous and non-Indigenous communities about the true climate and environmental performance of hydropower.

If IESO is serious about credibility and resilience, it must stop disseminating this disinformation and commit to honest, comprehensive regional planning that evaluates climate impacts, reservoir-related GHG emissions, and cumulative effects across watersheds; requires rigorous, independent environmental analysis; and ensures early, accessible, well-resourced public and Indigenous engagement before any preferred options are advanced.

Ontario cannot climate-proof electricity systems by sacrificing the very rivers, wetlands, and watersheds that climate resilience depends on.

Linda Heron, Chair
Ontario Rivers Alliance

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[1] *Ontario Provincial Climate Change Impact Assessment, Technical Report, January 2023. Online: https://www.ontario.ca/files/2023-11/mecp-ontario-provincial-climate-change-impact-assessment-en-2023-11-21.pdf*

[2] *Reservoir Water Surfaces: A New Global Synthesis,* BioScience*, Volume 66, Issue 11, 1 November 2016, Pages 949–964, https://doi.org/10.1093/biosci/biw117*