

Feedback Form

Regional Electricity Planning in the Toronto Region – July 10, 2025

Feedback Provided by:

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Date: July 19, 2025

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

Following the Toronto regional planning webinar held on July 10, 2025, the Independent Electricity System Operator (IESO) is seeking feedback on the results of the options screening. A copy of the presentation as well as recording of the session can be accessed from the [engagement web page](#).

Please submit feedback to engagement@ieso.ca by July 25, 2025.

Topic	Feedback
What feedback do you have regarding the results of the wire and non-wire options screening?	See below
What feedback do you have on the preliminary transmission wire options?	I am not providing any feedback on them in this submission.
What feedback do you have regarding how screened-in options could inform the options analysis and draft recommendations?	As conservation is the lowest cost and fastest to implement I would suggest that it be given preference. I would suggest that a risk assessment with possible mitigations be included.
Additional information that should be provided in future engagements to help understand perspectives and insights.	A risk assessment with possible mitigations would be helpful. Would be helpful to see why power sourced from nuclear was screened in to understand why power from renewables was screened out. While I understand that power from Great Lakes wind was screened out for political reasons it would be useful to see how much potential power it could provide as part of the solution.

General Comments/Feedback

I am encouraged to hear that the IESO is exploring non-wire options for Toronto and hope that, at a minimum, it will involve a number of pilots of parking lot solar, micro-grids, geothermal and other renewable based alternatives. It is never too late to start a proof of concept so that it can be replicated later with less risk. I am impressed to see that the Toronto District School Board has solar panels installed on almost 350 schools that can potentially power over 6,000 homes. I am impressed to see that the University of Toronto GeoExchange System has moved to storing energy to save energy. I am impressed by what Enwave is doing with Deep Lake Water Cooling and district heating in Toronto. Truly there are many existing examples of non-wire options that will reduce the demand for electricity.<<>>After hearing the Energy Minister emphasize that “all of the above” options would be considered, it was disappointing to hear that displacing PEC through Great Lakes wind is not being considered. I understand that the original moratorium was put in place because of required studies (long since completed) and people did not want to see wind turbines in Lake Ontario even though the wind turbines would be barely visible on the horizon. I would be curious to see if people were offered the choice between more pollution from gas plants, costly/risky nuclear versus wind turbines in the lake which they would choose. <<>>It is disconcerting to me that the options presented only provide the “Happy Path” which suggest bringing electricity in from nuclear power plants yet to be built. As one participant pointed out on July 10th, these SMRs have never been built before and nuclear power projects generally have a history of being delivered late. How would the Toronto

electricity needs be supplied in the “Unhappy Path” with late delivery and cost overruns imperilling future development? The Ontario government has stated that they are assuming the financial risk on the first SMR – what if actual costs inhibit private investors from financing others? <<>> I had hoped to see more discussion of risk related to Toronto’s electricity needs. Our future electricity supply is built on a number of complex projects. The IESO Forecast is complex. The introduction of new nuclear technology is complex. Sourcing the nuclear technology and enriched uranium from an unstable trading partner is complex. That the Ontario government plans to sell electricity from it’s nuclear fleet to other jurisdictions in a competitive market open to less expensive renewable energy is complex. Storing the spent nuclear fuel for 500,000 years or more is complex. In addition to these complexities we have threats to our infrastructure from extreme weather and climactic conditions. We know from the 2000 Tech Bubble, the 2001 Enron scandal and the 2008 sub-prime mortgage meltdown that high risk ventures tend to fail suddenly and dramatically. The site preparation for the first SMR at Darlington began this year and it is perhaps the easiest phase. Subsequent Darlington milestones will tell us whether confidence in all the stacked complex projects is warranted. It is unclear from the presentation how these significant and probable risks will be managed. <<>> In 2018, over 700 renewable energy contracts were cancelled. The reason given was they were driving up the electricity rates in Ontario. It certainly appears that we are about to do the same with nuclear power. I did hear at the webinar the suggestion that the IESO at least evaluate the potential of Great Lakes wind power and I think that is a brilliant idea. Something smells terribly off about this proposal when the only argument offered against renewables is the amount of space they would take up. I am troubled by this gap between supplying Toronto with expensive nuclear power and the significant support for supply from less expensive, quick to install, clean renewable power with battery storage. I have heard that investors prefer renewables because of the higher rate of return it supplies. There is no apparent good reason to pursue extreme risk nuclear power for Toronto. <<>> I have every confidence in the professional qualifications of the IESO people that put together the demand forecast which I expect was an exceedingly difficult task. I also keep in mind that previous forecasts showing extensive growth have not played out as expected. I am curious to know what quality assurance has been employed with this forecast given that it is driving extremely expensive costs to satisfy. <<>> I found it curious that while energy security was mentioned it did not discuss the SMR supplier and enriched uranium being from the US. I also find it curious that nuclear power is called affordable when the rest of the world appears to be running almost exclusively with wind, solar and battery storage because of the cost differential. There is a significant cost difference between the costs of expensive nuclear power and inexpensive renewables. <<>> I looked for some type of risk analysis on wire vs non-wire alternatives and did not see it. Certainly after the 1998 Quebec Ice Storm, the 2018 Toronto ice storm, the 2022 Ontario Derecho and the 2025 Ontario Ice Storm it bears some discussion as a risk to Toronto’s needs as these types of storms may occur more frequently. Forest fires damage electrical infrastructure. Is there sufficient extra capacity in transmission to switch over supply from a damaged supply route? Is it possible to switch supply within Toronto around an impacted neighbourhood? <<>> The “no regrets” decisions might need to be expanded to consider redundancy of supply, transmission and local distribution. I have heard that the IESO tends to favour large centralized solutions. Going forward we may be entering a period where multiple and redundant solutions are better to mitigate whatever threats might emerge. <<>> I have heard all manner of weak excuses for not expanding the supply of wind and solar and retaining gas. For at least two decades the excuse was renewables aren’t a mature technology or they don’t work “when the sun doesn’t shine and the wind doesn’t blow.” Or that Canada doesn’t get enough

sunlight during winter. Most recently, proponents from at least two proposed gas projects say that using electricity from gas plants prevents GHG where industry burns dirtier fossil fuels - even though the GHG from gas extraction and transport are not included in their emissions calculations for gas plants. In this presentation, we are hearing that wind and solar take up too much room. The gas industry wants gas retained in home heating as a backup for “really cold days” without reference to cold climate heat pumps. That Nordic countries, at the same latitude as Hudson Bay, are aggressively expanding wind and solar power begs the question, why not Ontario? It causes pause for thought to see the expected increase in electricity from gas while the supply from wind and solar remains relatively stagnant. Why not Ontario when wind and solar are well understood, lower cost, cleaner, faster to install, healthier for the population and what will ultimately be used to replace gas at some point in the future. All or nothing thinking is a known cognitive distortion in human thinking and this might qualify for that. I am not seeing positive statements like “we will achieve x% of power from wind and solar by y date”. <<>> That Enbridge is responsible for energy savings program when they profit from anything that would burn more gas causes me concern and I hope that their contract is performance based on achieving a certain level of savings rather than being paid to run a program. <<>> Slide 14 indicates PEC is expected to remain in service without indicating a timeframe for “long-term”. Will PEC be eliminated in one fell swoop or will it be phased out incrementally over time. I would like to see the target dates for how we will reduce our reliance on PEC step by step. <<>> Slide 15 indicates evaluation of a scenario to reduce reliance on PEC and I welcome a gradual displacement of PEC as long as a firm timeline is established. <<>> I don’t know that anyone expected to see an estimate of how much space would be taken up in Toronto with battery, solar and wind all being generated in the city. I’m not sure what such a study proves. You might have shown how much Lake Ontario space would have been taken up using Hydrostor Corp’s technology (<https://electricalindustry.ca/changing-scenes/1785-world-s-first-utility-scale-underwater-compressed-air-energy-storage-system-activated-in-lake-ontario/>) <<>> I was pleased to see the emphasis on conservation as it is the least expensive and can be done relatively quickly in comparison to large projects. I was pleased to see that Transform TO targets were taken into consideration. I am hoping that that non-wire options for Toronto will include targets to achieve solar installations on 25% of homes/buildings in 2 years and 50% in 4 years.