

# Feedback Form

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

### Feedback Provided by:

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Date: July 21, 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](mailto: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?	1. The potential contribution of non-wire power, particularly solar, appears to be underestimated. For example, the IESO presentation did not consider the considerable potential of roof top solar on commercial buildings and parking lots.
What feedback do you have on the preliminary transmission wire options?	1. The phase out of the Portlands Energy Centre (PEC) was addressed in general terms only. Given the inordinate amount of public health and GHG pollution from PEC, the IESO's recommendations should set out a clear time line for PEC's phase out.
What feedback do you have regarding how screened-in options could inform the options analysis and draft recommendations?	1. A Local Achievable Potential Study has not been made available, which makes it impossible for the public to adequately evaluate the contribution to Toronto's electricity needs that renewables, storage, demand management, conservation and district energy can make, and their effect on the need for a third line.
Additional information that should be provided in future engagements to help understand perspectives and insights.	1. As noted in my reply to questions 1 and 3, the IESO presentation presented conclusions, but did not provide the data and analyses upon which these conclusions were based. This makes it impossible for the public to assess the IESO's recommendation that a third line is the optimal solution to meeting Toronto's future electricity needs.

## General Comments/Feedback

Question 1 (cont) 2. The IESO presentation slides did not set out the methodology used to calculate the amount of land necessary in Toronto for renewables, which makes it impossible to evaluate the soundness of the IESO's discounting of solar, wind and storage options. 3. The IESO presentation did not take into account affordability. Virtually every professional analysis (including several from the IESO) concludes that wind and solar are considerably cheaper than nuclear and gas generation. As well, while the IESO recommends a third line to Toronto, there was no analysis at all of the cost and time frame for constructing the third line. 4. The potential for Great Lakes wind should have been assessed. The justification for excluding this option (The provincial moratorium of off-shore wind) is not tenable. If, true to its name, the IESO is in fact "Independent", it would have included Great Lakes wind power in its analysis so that the people of Ontario could understand the off-shore wind moratorium's true cost, and its effect on the need for a third line.

Question 3 (cont) 2. As a general comment, the role of energy efficiency, conservation and demand management was largely absent from the IESO presentation, which accordingly presents an incomplete analysis of how Toronto's electricity needs can be met.

#### General comments

1. IESO staff referred several times to a "no regrets" basis for the IESO's recommendations about decisions relating to electricity generation and transmission. In the Q and A part of the webinar, an attendee asked what "no regrets" means. I found the answer by IESO staff to be, with respect, unintelligible. What I took from the answer is that "no regrets" is a euphemism for "no accountability". The IESO (and the provincial government) appear to be telling the public that policy decisions made about electricity generation and transmission must be accepted at face value, and that the public must never question (at present or in the future) why such decisions were made in light of the evidence known at the time, such as potential costs for various energy sources, potential for delays in implementation (particularly with nuclear refurbishment and experimental technologies such as SMRs), and effects on public health and the climate, among other considerations. This seems contrary to the principle that governments (and public bodies, such as IESO) must remain accountable for their decisions, and be prepared to revisit these decisions as future circumstances may warrant.
2. The analysis of Toronto's power needs must include considerations of public health (i.e. the pollution from the PEC, which will affect the health of Toronto residents) and the climate (i.e., the effect of CO2 pollution from fossil fuel generation at the PEC).
3. Given the considerable negative effects of the PEC's fossil gas generation, it must be phased out as soon as possible, and return to its originally contemplated role of a peaker plant for use at times of extreme demands on power. Every possible consideration should be given to meeting Toronto's electricity needs through the use of renewable power and storage, and other solutions such as demand management, conservation, energy efficiency and district energy.