Feedback Form

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

Feedback Provided by:

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Date: July 25, 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?	NRStor commends the IESO and the Regional Planning Project Team on their detailed analysis and options screening for Toronto. We support the inclusion of energy storage as standalone options/Non-Wires Solutions and as complementary transmission assets for wires solutions to help improve the reliability, efficiency and further decarbonization of the grid. NRStor supports the use of energy storage at both the utility and residential scales, and as a solution for bulk, transmission, distribution, and customer needs. Energy storage offers key opportunities for collaboration to meet Toronto's energy needs into the future.
What feedback do you have on the preliminary transmission wire options?	NRStor understands the need for transmission wires options for Toronto as the projected demand from growth in the city continues to increase. We believe that energy storage can act as a complimentary transmission asset (Storage-as-a-Transmission-Asset) especially if located in load centres like Toronto. We believe our 200 MW / 1600 MWh Toronto Storage Project proposed next to Hearn SS in the Portlands offers a great opportunity to provide flexibility for transmission line development while also providing capacity and ancillary services that will support the Ontario grid.
What feedback do you have regarding how screened-in options could inform the options analysis and draft recommendations?	In particular, the IESO should consider the Toronto Project led by Mississaugas of the Credit Business Corporation, NRStor and Aecon as a specific option to support the overall capacity needs in the province, provide flexibility in the development of the transmission line and offer ancillary services that increase reliability while also reducing greenhouse gas emissions. This Project is a majority Indigenous owned 200 MW / 1600 MWh Battery Energy Storage System ("BESS") located in the Toronto Portlands. This Project will support the large electricity demands coming from new major housing developments in the Portlands and simultaneously lower emissions as the BESS will dispatch stored clean energy during periods of peak demand and provide ancillary services instead of the Portlands Energy Centre ("PEC"). As PEC reaches

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	retirement age and the new Toronto transmission line is developed, the Project can act as a medium-term flexible solution in case of transmission delays and provide services to the grid to solve power quality issues, address voltage/VAR needs and offer frequency management. Further, the Project could create ratepayer savings by enhancing the connection point at Hearn SS for both transmission and local distribution needs thereby reducing the Hearn SS expansion costs for Hydro One and Toronto Hydro. Overall, this Project will help coordinate transmission into Toronto and help run the grid run more efficiently resulting in a more sustainable and reliable system. The Toronto Project team has submitted a SIA application to the IESO and the connection study is under way. Additionally, the Local Achievable Potential Study for behind-the-meter (BTM) DERs should engage directly with proponents to more accurately reflect the economic potential of active fleet projects including access to grants. Distributed BTM energy storage fleet projects can provide multi-grid services with high performance operability and thus must be adequately compensated. These projects are expected to be of increasing value in alleviating congestion issues within urban centres like the City of Toronto. NRStor has completed a pilot in the City of Toronto that demonstrates the success of this model at the residential level and is actively pursuing expanding to a commercial scale (of hundreds of units) which will provide material value to the IESO, Toronto Hydro, and host customers, in line with the Minister's June 12 2025 directive to the IESO. NRStor welcomes discussions with the IESO on the inputs to the L-APS and on the Toronto IRRP generally.
Additional information that should be provided in future engagements to help understand perspectives and insights.	In terms of BESS land requirements, for large scale projects generally you could get 100 MWh per acre. This is a very high-level estimate, but we think it might help when considering the land constraints for this option.

General Comments/Feedback

NRStor appreciates the opportunity for feedback on Regional Electricity Planning in Toronto. NRStor has developed and built one of Canada's largest and most technologically diverse portfolios of energy storage assets, including the 250 MW/1000 MWh Oneida Energy Storage Project in partnership with

Six Nations of the Grand River as well as thousands of home battery installations in Ontario and across Canada. As a leading profit-with-purpose energy storage developer, NRStor is invested in Ontario's energy system transformation to help meet today's objectives of affordability, customer centricity, decarbonization, resilience, and reliability.