Feedback Form

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

Feedback Provided by:

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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?	TERRE is pleased to see that gas generation has been screened out and some non-wire options (i.e., distributed energy resources and energy efficiency) screened in. It is concerning to us that transmission connected generation such as wind generation, solar generation and wind and /or solar + battery storage are screened out. To ensure full transparency and consideration of cost-effectiveness, the feasibility of Great Lake wind power integrated with non-wire options should be investigated to determine if a case might be made for lifting the current moratorium. The decision to screen out a combination of solar, wind, and batteries due to large land requirements requires further documentation and explanation. There is insufficient discussion of timeline impacts for nuclear options versus renewable options given that renewable sources are a faster build. The full potential of rooftop and parking lot solar, as reported by Ontario Clear Air Alliance and Environmental Defense, is not given adequate consideration.
What feedback do you have on the preliminary transmission wire options?	A clear target date for PEC phase-out, with interim milestones and regular public reporting of progress, should be developed. Potential delays in the dates at which proposed nuclear options come online, especially given that Small Modular Reactors, (SMRs) are a new and untried technology, leave open the risk that PEC will have to make up the gap for an extended period which is counter to the stated intention of reducing reliance on PEC. Insufficient cost analysis is provided for the preliminary transmission wire options, especially compared to renewable options which according to reports worldwide and IESO's own reports are less expensive. Reliance on enriched uranium for SMRs and fossil gas for PEC leaves us open to supply chain risks during times of trade war disputes.
What feedback do you have regarding how screened-in options could inform the options analysis and draft recommendations?	It is premature to finalize recommendations before the Local Achievable Potential Study – looking at the potential for energy efficiency, demand management, local renewables and energy storage – is complete and publicized.

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Additional information that should be provided in future engagements to help understand perspectives and insights.	There needs to be more complete and transparent reporting of sources and analysis.

General Comments/Feedback

Thank you for your July 10, 2025 presentation on the Integrated Regional Resource Plan (IRRP) for Toronto. As outlined in our previous submission from January 3, 2025, TERRE is committed to seeing a phase-out of the Portlands Energy Centre (PEC), by 2030. We appreciate several steps taken by the IESO, including evaluation of a scenario to reduce reliance on PEC; screening in of energy efficiency; demand-side management (DSM), distributed energy resources (DERs), battery storage; and, exclusion of new gas generation. We note that several of our concerns have not yet been addressed. We look to the IESO to establish a clear target date for PEC phase-out, with interim milestones and regular public reporting of progress. We will look for a significant commitment to DER (solar and wind) coupled with battery storage from within Toronto which can be used to progressively reduce demands on PEC. We feel that the significant opportunity to include Great Lakes wind power is being squandered to the detriment of the ratepayers in Toronto and the rest of Ontario. Our new concern is the third supply line into Toronto as it is expected to obtain the supply from nuclear power and we do not see any path where such a solution can deliver the cost savings that renewable power is delivering in other parts of the world. We are not talking parity with existing rates but fully expecting a rate reduction from renewables that is not achievable through nuclear power. While renewable contracts were deemed expensive in 2018, it appears we are about to do the same thing again – invest in high cost nuclear when lower cost renewable options are now available. If delays occur in the required nuclear supply coming on-line, especially given the untried status of Small Modular Reactors (SMRs), the power supply is vulnerable to an extended period of reliance on PEC. Dependence on the United States for fossil gas for PEC, and for enriched uranium for SMRs, leaves open the risk of border supply-chain issues and potential national security threats. We ask that the IESO evaluate the feasibility and cost-effectiveness of all renewable options, including factoring in offshore wind power. To fail to do so is inconsistent with the IESO's mandate to meet Ontario's need for reliable electricity at the lowest possible cost. TERRE exists to ensure an early phase-out of the Portlands Gas Plant, by 2030, and to replace it with renewable energy. To that end, we ask the IESO to systematically reduce the amount of electricity generated by PEC and to offset this reduction by an increase in electricity provided by renewable energy sources and effective conservation programs.