# Feedback Form

## Regional Electricity Planning in Toronto – September 25, 2025

### Feedback Provided by:

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Date: Oct 9, 2025

To promote transparency, feedback submitted will be posted on this engagement webpage unless otherwise requested by the sender.

Following the Toronto Region electricity planning engagement webinar held on September 25, 2025, the Independent Electricity System Operator (IESO) is seeking feedback on the options analysis and draft recommendations. A copy of the presentation as well as a recording of the session can be accessed from the engagement web page.

**Please submit feedback to engagement@ieso.ca by October 9, 2025.**

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| What feedback is there on the options analysis? | Thank you for the clear, iterative process and for inviting detailed municipal input. We appreciate the IESO's effort to modernize regional planning with screening for non-wires alternatives (NWAs), locational demand-side management, and battery energy storage systems (BESS) in the Integrated Regional Resource Plan (IRRP). We are pleased that the IESO recognizes the value of Thermal Energy Networks (TENs) as an efficient path to electrification that can lower peak demand and overall consumption. We reiterate our request that the IESO create a procurement pathway for electrified, peak-shaving TENs; include them in the NWA framework alongside DERs within IRRPs; and integrate them into resource adequacy. We encourage the IESO to recognize the electricity-system value of electrified, peak-shaving TENs (including large-scale electric heat pumps with waste-heat recovery and thermal storage etc.) through long-term capacity contracts and other procurement mechanisms that provide certainty to enable investment and fairly share these benefits between electricity ratepayers and thermal customers. This approach aligns with the Minister of Energy's June 2025 direction to the IESO to identify opportunities for district energy systems in current and upcoming policies, programs, and procurements. Recognizing the value of electrified, peak-shaving TENs through long-term system contracts and fairly sharing the value of these assets between electricity ratepayers and thermal energy customers will make it cost-effective to connect more buildings, including smaller or more distant sites, and will increase overall value to Ontario's grid. Per IESO, the City will work with Toronto Hydro to evaluate TENs' impact on substation-level peak reduction and incorporate findings into planning. The City and Toronto Hydro will coordinate to ensure Basin TS can supply the Port Lands. TENs may change upgrade timing, but Basin TS serves a wider area. Toronto Hydro will assess feeder and station impacts as behind- the- meter (BTM) demand and development advance. We encourage IESO to build pathways, so TENs are compensated for both provincial and local services. We support the IESO's decision to screen in BESS at Manby and Dufferin and look forward to discussing land use considerations as part of the next |

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| | steps. We would like to understand why BESS was screened out for the Port Lands. The City's Port Lands Energy Needs and DER Potential Study showed strong value for large-scale storage, given city growth. A large unit at this site could provide capacity and energy benefits to the provincial grid, not just the local area. With the preferred third supply line into the Port Lands, the case may have shifted. Please explain the screening criteria, siting constraints, and connection feasibility for the Port Lands. |
| What feedback is there on the draft recommendations? | We understand the underwater High Voltage Direct Current (HVDC) third supply as the least land-use-intensive option with strong resilience and bulk-system benefits. The City looks forward to engaging with the IESO in the near term on the converter station siting footprint in the Port Lands and any local distribution upgrades required so that the City can consider local land use considerations accordingly. Proposed wires solutions including a new Downsview TS and expansions at Scarboro and Basin intersect with redevelopment areas. The City looks forward to engaging with the IESO, Hydro One and Toronto Hydro in the near term on site options, approximate footprints, routes, and build timing so staging aligns with secondary plans and public works. We will continue to work with the IESO, Hydro One, and Toronto Hydro through existing and future working-group channels to coordinate station needs and redevelopment across the Port Lands, Downsview, and the Golden Mile (Scarboro TS area). |
| What information needs to be considered regarding these draft recommendations? | We appreciate the IESO's Integrated Energy Plan (IEP) aligned criteria, particularly the consideration of land use alongside reliability, resilience, broader system impacts, implementation complexity, and cost-effectiveness. Given Toronto's built out context, consideration will also be needed for overall footprint and siting, compatibility with nearby uses, access needs, potential community and environmental effects, and alignment with City plans and future growth. This will require early, ongoing and frequent engagement with the City and relevant stakeholders. The City appreciates the efforts taken in this regard through recent engagement around the IRRP, L-APS and on site specific developments, and looks forward to building on the |

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| | positive relationships that exist with the IESO, as we work closely with our partner Toronto Hydro and local stakeholders on integration of decision making. We understand the IRRP's incremental demand-side potential is informed by the L-APS and that updates are underway. As station-level relief is refined (for example, about 19 MW at Strachan and about 32 MW across Dufferin and Bridgman), please provide updates. We also note that even where eDSM at a given station is modest, aggregated batteries and other DER portfolios could be sizable at the portfolio level. |
| What should be considered regarding the third supply line before the regional plan is released? | We look forward to continued and early engagement and consultation on the Port Lands converter associated with the underwater corridor. We look forward to early engagement on land needs, likely layouts for Hearn and Basin, and construction timelines. Early engagement will be important to enable alignment with City building and flood protection work. We recognize the transmitter will lead environmental assessments and anticipate that they will identify underwater route and landfall constraints early, including aquatic habitat, sediment disturbance, navigation and recreation, shoreline resilience, Indigenous heritage, and interactions with existing infrastructure such as the Ashbridges Bay outfall, with clear mapping. This will be important to support City coordination and to build confidence that any impacts of the projects will be mitigated appropriately. As noted in the webinars, we understand that the third line is not contingent on any specific generation project and could accommodate future offshore wind and other large or aggregated renewables. Please confirm. We appreciate that the selected design will be able to provide additional connection capacity for new renewable supply and DERs in the Port Lands. Could you confirm whether this added connection capacity would benefit only the Port Lands or could also support needs elsewhere in the city? |
| How can the IESO continue to engage with communities and stakeholders as these recommendations are implemented, or to help prepare for the next planning cycle? | City of Toronto staff recommends that the IESO initiate coordination/collaboration groups (including IESO, Hydro One, Toronto Hydro, the City, landowners) to exchange design updates, construction windows, and land constraints. We also recommend creating a dedicated |

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| | TEN working group including IESO and Toronto Hydro to address both distribution and transmission benefits, procurement pathways, and integration with planning. For BESS and substation upgrades, we recommend early geotargeted engagement to uncover land-use/amenity considerations and identify mutually acceptable sites. The Local Achievable Potential Study is a strong step. We support geo-targeted programs with flexible regional incentive adders that reflect both transmission and distribution needs. We support IESO's efforts to streamline access for local utilities to use rate-payer funds for NWAs. In priority areas, the IESO and local distributors should co-design and co-fund programs, stacking funding where additional demand-side management can serve bulk system, regional transmission, and local system needs. We look forward to working with Toronto Hydro on enabling both wire and non-wire solutions that will make our grid resilient for a net zero electrified future. |

## General Comments/Feedback

We appreciate the level of engagement and the IESO's willingness to update analyses based on feedback. The Toronto Working group (TWG) evaluated a scenario for reduced reliance on the Port lands Energy Centre to understand the capability and flexibility of the options and to ensure a reliable and affordable supply of power to the city of Toronto under different future scenarios. Please share this analysis. We thank you for the opportunity to provide feedback.