# Regional Electricity Planning in Toronto – September 25, 2025

## Feedback Provided by:

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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? | The IESO's draft Integrated Regional Resource Plan (IRRP) for Toronto relies heavily on centralized electricity infrastructure and an energy mix dominated by nuclear and gas generation. At the same time, it **underrepresents or excludes entirely** many of the **cost-effective, distributed, and low-carbon solutions** that are essential to achieving the City of Toronto's TransformTO climate targets. While the options analysis offers a technical assessment of transmission and bulk supply, it fails to present a **complete and balanced evaluation** of the full range of electricity pathways available to the city, especially those that would enable a just and timely energy transition. Most notably, the options analysis fails in providing:<br><br>• **No pathway for retiring the Portland Energy Centre (PEC) by 2035**, despite clear Council direction to do so.<br>• **Over-reliance on large-scale nuclear supply -** from 48% to 75%. Yet much of this nuclear supply will be unavailable in the near term due to refurbishment schedules and construction timelines, and is prohibitively expensive (e.g., new builds at 22–32¢/kWh).<br>• **Failing to include rooftop solar potential in scenarios,** even though it could generate 4.9 TWh/year—enough to replace PEC's output and meet 15–25 % of projected new demand.<br>• **Over-reliance on large transmission projects** rather than maximizing local, non-wires options such as rooftop solar, battery storage, and efficiency<br><br>The analysis reflects a continued preference for centralized supply and transmission of nuclear power and gas generation at the expense of Toronto's potential to lead in **clean, distributed, and affordable energy**. |
| What feedback is there on the draft recommendations? | Environmental Defence Canada is asking the **IESO to revise the draft IRRP recommendations to better align with the City of Toronto's climate commitments**—particularly |

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| | the Council-endorsed phaseout of the Portlands Energy Centre (PEC) by 2035 and the broader TransformTO goal of net-zero emissions by 2040. The IRRP must include a clear and transparent plan to retire PEC on schedule, supported by interim milestones, and a mix of clean, local solutions that enable its replacement.<br><br>Specifically, **we are calling for the IRRP to prioritize distributed and demand-side energy solutions,** including rooftop and balcony solar, community energy storage, and energy efficiency programs—resources that are cost-effective, scalable, and underutilized in the current draft. The IESO should also model the impacts of the removal of policy barriers to offshore wind development and incorporate this potential supply into long-term planning. These changes would produce a cleaner, more resilient, and more equitable electricity plan that positions Toronto as a national leader in community-powered climate action. |
| What information needs to be considered regarding these draft recommendations? | The IRRP must incorporate the following:<br><br>• The **City of Toronto has an explicit climate mandate** to phase out gas-fired power at PEC by 2035.<br>• **Independent modeling on distributed and demand-side energy solutions,** namely on the potential of rooftop solar, along with battery storage and demand reduction, as an alternative pathway to cover a major share of demand growth. The analysis must also identify how utilities, the IESO and governments can close any gap between the technical and economic potential of DERs and the achievable potential.<br>• **Cost data** on energy efficiency and solar compared to the costs of new nuclear (SMRs) and gas reliance, including health care costs and other climate damages, especially when grid and system costs are considered.<br>• **Equity considerations**, particularly the opportunity to reduce bills and support local ownership through |

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| | distributed energy and fair compensation for solar exports.<br>• **Global and national trends** toward grid decentralization, V2G, and flexible demand—technologies that the IRRP currently ignores but will soon be standard.<br><br>Incorporating this information would ensure the IRRP reflects economic, environmental, ethical, and system realities—not just legacy assumptions. |
| What should be considered regarding the third supply line before the regional plan is released? | While the third supply line (underwater HVDC from Bowmanville to Toronto) can enhance resilience and enable renewable imports, it must not be viewed as a substitute for local decarbonization. Before advancing this recommendation, the IESO should:<br><br>• Clearly articulate how the line **supports (not delays) the phaseout of Portland's gas plant**.<br>• Model scenarios where the line is paired with **offshore wind development** and **increased DER deployment**.<br>• Commit to integrating this project with a **broader decarbonization roadmap**, not just bulk system reinforcement.<br>• Consider the long lead time (in-service by 2034) and avoid letting it delay more immediate investments in solar, storage, and efficiency. |

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| 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? | To build public trust and engagement, the IESO should:<br>• Partner with the City of Toronto, Indigenous groups, and civil society to **co-develop a local decarbonization roadmap**, including timelines, pilots, and measurable targets.<br>• **Create a dedicated local energy engagement stream** for community groups, municipalities, and DER providers—distinct from traditional utility stakeholders.<br>• Hold **public sessions focused on solar, storage, and demand-side solutions**—not just wires projects.<br>• Establish a transparent, public-facing **dashboard** showing progress on DER deployment, gas phase-out, and efficiency uptake.<br>Ensure future planning cycles **explicitly model compliance with TransformTO** and other climate targets—not treat them as optional. |

## General Comments/Feedback

Toronto has the opportunity to lead the country in building a clean, affordable, and resilient urban energy system. But the current IRRP draft is misaligned with that vision. It:

- Continues to **delay meaningful action on gas phase-out**;
- **Neglects rooftop solar, battery storage, and energy efficiency** as scalable and cost-effective solutions;
- Fails to support the **decentralized, participatory model** of energy that many Torontonians are ready to embrace.

We urge the IESO to revise the draft IRRP to:

1. Include a **clear and accountable plan to phase out the PEC by 2035**;
2. Invest meaningfully in **rooftop solar, behind-the-meter storage, and energy efficiency**;
3. Advocate for the **removal of policy barriers** to offshore wind;
4. Commit to **meeting the TransformTO targets** in a measurable and transparent way.

With these changes, the IRRP can become a true roadmap to a zero-carbon, community-powered Toronto.