Feedback Form

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?	TERRE (Toronto East Residents for Renewable Energy) is especially concerned that the options analysis provided no plan for when the Portland's Energy Centre (PEC) will be phased out and no interim reduction targets for PEC. Significant concerns were expressed by community members and NGOs about air quality and related health impacts from PEC during the engagement process for PEC's recent capacity expansion and during the IRRP process. In the summer of 2023, PEC was identified as the largest single emitter of health-harmful nitrogen oxides (NOx) in Toronto. Recent data on PEC emissions from the National Pollutant Release Inventory (NPRI) indicates that NOx emissions increased in 2024, as did emissions of particulate matter (PM) and volatile organic compounds (VOCs). This trajectory necessitates an urgent look at the phaseout of the plant. The options analysis is not consistent with the City of Toronto's request that the IESO develop a plan to phaseout PEC, rapidly increase local renewable energy generation and storage, and maximize cost-effective energy efficiency. Further, it is not supportive of the City's TransformTO target of net-zero by 2040. The analysis is heavily reliant on large generation/transmission projects and severely underestimates less costly and more resilient local non-wires options such as rooftop solar, battery storage, and energy efficiency programs. It is concerning that Vehicle-to-Grid (V2G) was not considered at all despite its potential. Also concerning is the failure to take into consideration innovations such as balcony solar and parking lot solar. Screening out consideration of Great Lakes wind production limits the value of the analysis for cost comparison.
What feedback is there on the draft recommendations?	The draft recommendations need to include a clear pathway for the phaseout of PEC by 2030, including interim milestones and regular public reporting of progress. The planned third line, while bringing electricity to the city, is unfortunately dependent on costly, untested small modular nuclear and gas-fired electricity production. The draft recommendations need to give greater priority to expanding the role of distributed energy resources (DERs), energy efficiency and demand side management. We continue to suggest that the recommendations include

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	review of the potential for offshore wind development to determine the cost savings it would provide.
What information needs to be considered regarding these draft recommendations?	TERRE was disappointed that there was not more of an effort to identify additional energy savings and electricity generation from within the boundaries of Toronto and offshore on Lake Ontario. A scenario of high uptake of measures such as energy efficiency and local renewable energy would be informative. More consideration should be given to the City of Toronto's request for PEC phaseout and rapidly increased local renewable energy generation and storage. World-wide trends in the development and lowering costs of renewable sources raise the possibility that these recommendations will leave Ontario with massive debts for outdated and stranded assets producing expensive and polluting electricity that no one wants to buy. Comparisons with cities that have successfully implemented local renewable options and energy conservation measures should be considered. For example, Berlin, Germany which is more northerly than Toronto, has about a million more people than Toronto, and is larger than Toronto by 250 sq km in area, plans to get 25% of their electricity from DER Solar by 2030. Consideration should also be given to the external costs associated with extended dependence on fossil fuels at PEC and gas plants around the province (during the wait time for the 3rd transmission line) and the failure of the draft IRRP to more aggressively pursue local renewable alternatives. These external costs include health care costs, infrastructure damage, insurance increases and other burdens for the City and individual Torontonians from air pollution and climate change.
What should be considered regarding the third supply line before the regional plan is released?	The planned third line, while bringing electricity to the city, is unfortunately dependent on costly and untested small modular nuclear and gas-fired electricity. We suggest that the draft recommendations give greater priority to expanding the role of distributed energy resources, energy efficiency and demand side management. Alternative options to achieve the 900 MWs should be provided for comparison and consideration.

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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?	The community voice is missing from this engagement. For community engagement to be effective and community concerns to be adequately integrated into the process and the plan, additional engagement opportunities need to included to allow for a more user-friendly sharing of information, rather than highly technical presentations, and for a two-way dialogue with concerned residents and groups. The IESO needs to provide full and transparent information about the pros and cons of wires and non-wires solutions, including consideration of the costs and savings for residents, the air quality, health and climate impacts, and our dependence on the United States for fossil fuels and other inputs.

General Comments/Feedback

Thank you for acknowledging that IESO received many responses expressing a strong preference to align with Toronto's climate efforts and the use of energy solutions like energy efficiency, demand response, energy storage and renewables. We were disappointed that this acknowledgement did not translate into substantive changes to the draft plan and that the feedback received by the IESO in the engagement process did not lead to adequate consideration of these energy solutions. It appears as though the results of the process have been designed to support the Ontario Government's gas and nuclear energy vision, rather than truly address and integrate local community concerns and municipal directives. The explanation during the webinar that the proposed underwater third line could bring a mix of energy resources to the City of Toronto does little to allay our concerns since it ignores the fact that, without expansion of resources such as offshore wind, the energy mix will primarily consist of nuclear and gas-fired electricity. Issues with nuclear expansion related to current trade wars and to concerns with our dependence on the US – not to mention the massive cost to taxpayers – remain. Issues related to climate and local health issues associated with gas-fired electricity plants also remain. This draft report represents a significant missed opportunity to support truly clean, affordable, and reliable electricity generation for Ontario's largest urban centre. TERRE found the process to be flawed and the results inadequate. We need a better and more comprehensive approach.