



POWER WORKERS' UNION

October 2, 2023

Independent Electricity System Operator
1600-120 Adelaide Street West
Toronto, ON
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Via email to engagement@ieso.ca

Re: Burlington to Nanticoke Regional Planning

The Power Workers' Union ("PWU") represents a large portion of the employees working in Ontario's electricity industry. Attached please find a list of PWU employers.

The PWU appreciates the opportunity to provide input on the Burlington to Nanticoke Regional Planning. The PWU is a strong supporter and advocate for the prudent and rational reform of Ontario's electricity sector and recognizes the importance of low-cost, low-carbon energy to the competitiveness of Ontario's economic sectors.

The PWU believes that IESO processes and initiatives should deliver energy at the lowest reasonable cost while stimulating job creation and growing the province's gross domestic product (GDP). We are respectfully submitting our detailed observations and recommendations.

We hope you will find the PWU's comments useful.

Yours very truly,

Jeff Parnell
President

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List of PWU Employers

Abraflex
Alectra Utilities (formerly PowerStream)
Algoma Power
AMEC Nuclear Safety Solutions
Aptum (formerly Cogeco Peer 1)
Atlantic Power Corporation - Calstock Power Plant
Atlantic Power Corporation - Kapuskasing Power Plant
Atlantic Power Corporation - Nipigon Power Plant
Bracebridge Generation
Brighton Beach Power Limited
Brookfield Power Wind Operations
Brookfield Renewable Power - Mississagi Power Trust
Bruce Power Inc.
Canadian Nuclear Laboratories (AECL Chalk River)
Chapleau Public Utilities Corp.
Centre Wellington Hydro
Collus Powerstream
Compass Group
Cornwall Electric
Corporation of the County of Brant
Covanta Durham York Renewable Energy Ltd.
Elexicon (formerly Whitby Hydro)
Enova (formerly Kitchener-Wilmot & Waterloo North)
Enwave Windsor
Epcor Electricity Distribution Ontario Inc.
Erth Power Corporation (formerly Erie Thames Powerlines)
Erth Corporation
eStructure
Ethos Energy Inc.
Great Lakes Power (Generation)
Greenfield South Power Corporation
Grimsby Power Incorporated
Halton Hills Hydro Inc.
Hydro One Inc.
Hydro One CSO (formerly Vertex)
Hydro One Sault Ste. Marie (formerly Great Lakes Power Transmission)
Independent Electricity System Operator
InnPower (Innisfil Hydro Distribution Systems Limited)
Kinectrics Inc.
Lakeland Power Distribution
Laurentis Energy Partners
London Hydro Corporation
Milton Hydro Distribution Inc.
Mississagi Power Trust
Newmarket Tey/Midland Hydro Ltd.
North Bay Hydro
Northern Ontario Wires
Nuclear Waste Management Organization
Ontario Power Generation Inc.
Orangeville Hydro Limited
Portlands Energy Centre
PUC Services
Quality Tree Service
Rogers Communications (Kincardine Cable TV Ltd.)
Sioux Lookout Hydro Inc.

August 2023

SouthWestern Energy
Synergy North (formerly Kenora Hydro Electric Corporation Ltd.)
Tillsonburg Hydro Inc.
The Electrical Safety Authority
Toronto Hydro
TransAlta Generation Partnership O.H.S.C.
Westario Power

Power Workers' Union Submission to the IESO on the Burlington to Nanticoke Regional Electricity Planning

October 2, 2023

The Power Workers' Union (PWU) is pleased to submit comments and make recommendations to the Independent Electricity System Operator (IESO) regarding its September 11th Burlington to Nanticoke Regional Electricity Planning webinar. The PWU remains a strong supporter and advocate for the prudent and rational reform of Ontario's electricity sector and recognizes the importance of planning for low-cost, low-carbon energy solutions to enhance the competitiveness of Ontario's economy.

The IESO is seeking feedback on the electricity demand for the region and any areas of concern that should be considered. The PWU is concerned with the IESO's statements during the webinar that it will be picking up on the scoping study conducted last fall and basing the planning activities on the 2022 APO demand reference case and any LDC provided inputs. The IESO did not mention the IESO's Pathways to Decarbonization (P2D) study findings or the recent government directives.¹ In fact the demand forecast provided, which is heavily dominated by the needs in Hamilton, shows demand growth peaking by 2029. The implications of electrification and population growth will change this forecast dramatically and within the planning horizon of any new transmission systems.

By not planning to consider the demand growth implications embodied by the government's directives, and not addressing the identified urgent needs for expanding nuclear and bulk system transmission planning, the IESO is exposing Ontario's electricity system to unnecessary reliability risks. As such, PWU provides the following recommendations that were also submitted in response to the IESO's request for feedback on its Central West bulk system plan, of which the Burlington to Nanticoke region is part:²

1. The IESO should not base its forecast energy needs on the 2022 APO reference demand case but rather consider the demand forecast implications in the province's recent *Plan for a Clean Energy Future* [Powering Ontario Growth Report]³ and forthcoming Electrification and Energy Transformation Panel's commissioned Cost Effective Energy Pathways Study expected to be available this year. It can be expected that the demand forecast from that analysis will likely exceed the IESO's P2D forecast given the P2D exclusions of domestic hydrogen production and its lower assumptions for population growth, the critical minerals strategy and the transformation of the auto sector to EV production.
2. The Burlington to Nanticoke Regional Electricity Planning should be coordinated with the IESO's response to the government's directives regarding the evaluation of transmission options for new nuclear developments.⁴

Details can be found in the Central West bulk system planning submission.

Closing

The PWU believes that the identified concerns warrant that the IESO's process should be adjusted to include the critical identified factors that are accelerating demand growth at a pace faster than that being

¹ Ministry of Energy, Letter to the IESO re Powering Ontario's Growth, July 10, 2023.

² PWU Submission to the IESO on the Central-West Bulk System Plan, August 29, 2023.

³ Government of Ontario, "Powering Ontario's Growth: Ontario's", July 10, 2023.

⁴ Ministry of Energy, Letter to the IESO re Powering Ontario's Growth, July 10, 2023.

accommodated by the IESO's processes. The PWU has a successful track record of working with others in collaborative partnerships. We look forward to continuing to work with the IESO and other energy stakeholders to strengthen and modernize Ontario's electricity system. The PWU is committed to the following principles: Create opportunities for sustainable, high-pay, high-skill jobs; ensure reliable, affordable, environmentally responsible electricity; build economic growth for Ontario's communities; and, promote intelligent reform of Ontario's energy policy.

We believe these recommendations are consistent with and supportive of Ontario's objectives to supply low-cost and reliable electricity for all Ontarians. The PWU looks forward to discussing these comments in greater detail with the IESO and participating in the ongoing stakeholder engagements.