Feedback Form

Bulk Planning Update Webinar (Eastern Ontario Bulk Plan) – December 12, 2025

Feedback Provided by:

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Email: [redacted]

Date: 23 January 2026.

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

Following the Bulk Planning Update Webinar held on December 12, 2025, the Independent Electricity System Operator (IESO) is seeking feedback. A copy of the presentations as well as recordings of the sessions can be accessed from the engagement web page.

Please submit feedback to engagement@ieso.ca by January 23, 2026.

Eastern Ontario Bulk Plan

Topic	Feedback
What feedback do you have regarding the proposed 230 kV transmission reinforcement options to improve supply to Belleville?	ORA supports reinforcements only where the IESO has demonstrated clear **need** using transparent assumptions, uncertainty ranges, and **climate-resilience stress testing** (drought/flood/extreme heat). ORA recommends that all Belleville options be evaluated against a **non-wires first** framework (conservation, demand response, storage, distributed resources) with comparable cost, deliverability timelines, and resilience performance. ORA's broader concerns and recommendations regarding induced development, cumulative effects, and governance are provided in **General Comments**.
What feedback do you have regarding the proposed conceptual transmission reinforcement options to enhance supply into Ottawa from various sources?	ORA supports Ottawa-area reliability planning where it is demonstrably necessary and assessed using climate-resilient baselines and transparent load assumptions. ORA recommends that IESO prioritize a **non-wires first** approach and explicitly assess cumulative and induced impacts associated with transmission expansion, particularly where bulk infrastructure may enable broader development pathways. ORA's detailed concerns and recommendations are provided in **General Comments**.
What additional information should we consider as we continue developing these solutions leading up to the recommendations?	ORA recommends that IESO provide the underlying evidence needed for meaningful review, including: (i) Full disclosure of load forecast assumptions and **uncertainty ranges/confidence intervals**, (ii) Climate non-stationarity stress-testing (drought, flooding, extreme heat, hydrologic variability), (iii) A transparent **non-wires alternatives assessment** with comparable cost/timelines/reliability contribution, and (iv) Identification of any **induced development** and enabling objectives associated with proposed bulk reinforcements.

Topic	Feedback
	In addition, IESO should explicitly demonstrate how its bulk planning methodology incorporates **Ontario's Provincial Climate Change Impact Assessment** and other authoritative climate-risk guidance to ensure planning decisions are resilient under future climate conditions. ORA is also concerned that the Eastern Ontario Bulk Planning engagement relies heavily on dispersed technical tables and multiple supporting documents, making them difficult for the public to navigate and compare. This structure materially undermines accessibility, transparency, and the ability of communities and Indigenous Nations to provide informed feedback.

ORA General Comments/Feedback

The Ontario Rivers Alliance (ORA) appreciates the opportunity to provide input on the Eastern Ontario Bulk Planning engagement. ORA has participated throughout earlier phases of this process; accordingly, this submission focuses on the core unresolved issues that continue to undermine the credibility and legitimacy of bulk transmission planning in Ontario:

- **(i)** Planning certainty that exceeds the evidence in an era of extreme uncertainty,
- **(ii)** A wires-first approach that risks pre-approving system expansion and induced development,
- **(iii)** A continuing reliance on "non-emitting" narratives that greenwash hydropower impacts and fuel climate change, and
- **(iv)** The hollowing out of Ontario's environmental protections and assessment regimes at precisely the moment when climate resilience demands the opposite.

ORA submits that Eastern bulk planning must not function as a backdoor implementation tool for the Province's post-election "Energy Superpower" agenda. Voters, and ultimately ratepayers, did not authorize a supply-expansion and export trajectory. The IESO must therefore clearly distinguish between reinforcements required to meet demonstrated Ontario reliability needs and those designed to enable speculative industrial growth or new generation development pathways—particularly high-impact hydropower expansion. Bulk planning must not be used to pre-build capacity and corridors for an export-oriented supply surplus.

ORA further submits that the Province's "Energy Superpower" framing is economically reckless and directly contrary to ratepayer interests. Ontario households have already experienced a significant electricity price shock: the Ontario Energy Board increased Regulated Price Plan electricity prices effective November 1, 2025 (widely reported as a ~29% increase), while the Province simultaneously increased the Ontario Electricity Rebate from 13.1% to 23.5% in an apparent effort to buffer bill

impacts.[1] This is not a stable affordability moment to hard-wire major new system-expansion costs into Ontario's electricity future.

Ratepayers are already experiencing significant affordability impacts, including sharp increases in total electricity bills since November 2025, even after provincial rebates. For example, a residential Hydro One customer's Hydro bill from December 2025–January 2026 shows total charges of $642.33 for 4,177 kWh, including an Ontario Electricity Rebate of –$168.66 and "Total Ontario support" of $321.67 — confirming that rising system costs are increasingly being masked through subsidies rather than avoided through least-cost planning. This illustrates the structural affordability problem: costs are rising sharply, and rebates are being increased to mask the impact rather than reduce the underlying drivers.

At the same time, Ontario Power Generation (OPG) has sought a dramatic increase in the payments it receives for nuclear generation, reported as a 72.6% increase, for new nuclear generation and major refurbishment liabilities.[2] Regardless of how the final numbers are determined through OEB proceedings, the direction is clear: Ontario ratepayers are being positioned as the long-term backstop for escalating capital, financing, and refurbishment costs across the system. Bulk transmission plans sized to enable speculative industrial growth, new hydropower development, and generation expansion will amplify these risks for decades.

In short, Ontario cannot claim "affordability" while pursuing an export-oriented "superpower" agenda that requires ratepayers to underwrite massive long-lived infrastructure and associated planning costs.

Ontario is living in profoundly uncertain times. Economic volatility, industrial load uncertainty, changing geopolitical conditions, and climate disruption all materially affect electricity demand trajectories and system needs. Yet Ontario's planning documents still rely heavily on historic baselines as the reference point for system adequacy. For example, the IESO's 2025 Annual Planning Outlook notes that "*Normal weather accounts for weather based on historical climate only, not climatic change*".[3]

This is backwards. Ontario is building and financing infrastructure intended to operate for 50–100 years in a rapidly warming world, yet the planning baseline is anchored in yesterday's climate. Climate non-stationarity means historical averages are no longer a reliable foundation for grid planning. Transmission and bulk supply decisions that do not incorporate climate-adjusted hydrology, extreme-weather risk, drought and flood cycles, and warming-water impacts are not "reliability planning"—they are **risk transfer** to ratepayers, ecosystems, and future generations.

ORA is concerned that bulk transmission planning continues to rely on historic baselines that explicitly exclude climate change, and does not transparently demonstrate alignment with Ontario's own **Provincial Climate Change Impact Assessment**.[4] In a climate-disrupted future, failure to integrate Ontario's best available climate-risk science into infrastructure planning is not a technical oversight — it is a governance failure that increases costs and risk for ratepayers and communities.

ORA submits that the appropriate response to uncertainty is not to hard-wire Ontario into long-lead, high-capital, high-risk megaproject pathways. Bulk planning should instead prioritize a least-cost, climate-resilient portfolio built around **conservation and energy efficiency**, **demand response**, **distributed generation**, **utility-scale wind and solar** with **grid-scale battery and long-duration storage**, supported by targeted local reinforcements where needed. These resources are **modular, scalable, and fast to deploy**, allowing Ontario to adapt as actual demand materializes

rather than building ahead of need. Ontario should also accelerate **geothermal and building electrification** (heat pumps) as demand-side capacity tools that reduce winter peak stress. By contrast, overreliance on nuclear and new hydropower development locks ratepayers into multi-decade financing risk, construction uncertainty, long-lived environmental liabilities, and governance conflict — precisely the wrong risk profile in a climate-disrupted future.

Unlike modular renewables, new hydropower is not a reversible planning choice: it locks Ontario into **~100 years of ecological disruption and long-term methane (CH_4) liabilities, because reservoir and headpond methane emissions persist over time and can intensify as reservoirs age and sediments accumulate**.[5] This is a long-term emissions commitment, not a short-lived construction footprint. It subjects our children and future generations to both ongoing climate impacts and eventual dam safety and decommissioning/dam-removal costs. These costs are not even considered in Ontario's procurement contracts or the environmental assessment and approvals process.

This approach is inconsistent with climate non-stationarity and risks overbuilding, misallocating public capital, and locking Ontario into infrastructure that does not perform as expected under extreme heat, drought, flooding, and watershed instability.

ORA is also concerned that bulk planning is increasingly framed as enabling economic expansion and "deliverability of resources" rather than solely meeting demonstrated reliability needs. The IESO's bulk planning materials explicitly link transmission expansion to resource deliverability and electrification-driven growth.[6]

In parallel, the Annual Planning Outlook confirms that the IESO is developing long lead-time procurement that "could include… new hydroelectric generation."[7]

ORA submits that these planning signals must be treated as a warning flag: **bulk transmission planning can become enabling infrastructure that predetermines development pathways**, including high-impact hydropower expansion, before environmental risks, cumulative effects, and Indigenous rights impacts are transparently assessed.

Hydropower is repeatedly positioned by governments and system actors as "clean" and "non-emitting," despite extensive global evidence that reservoirs and headponds can be significant methane sources and can intensify emissions under warming temperatures, fluctuating operations, and organic-rich sediment accumulation. Ontario's public policy framing increasingly relies on hydropower as a climate solution; however, climate change is simultaneously undermining hydropower dependability (drought cycles, extreme rain events, warming waters, and altered hydrology). Planning that assumes hydropower is both "firm" and "non-emitting" is not climate-resilient planning — it is **risk transfer** to ratepayers, ecosystems, and Indigenous Nations.

ORA is further concerned that this engagement process occurs within a provincial governance context where environmental protections and independent assessment pathways are being weakened. Ontario's recent pattern of "streamlining" environmental approvals, weakening oversight, and rolling back Species-at-Risk protections creates a credibility gap: the public is asked to trust that impacts will be assessed later, even as the very laws and institutions required to assess them are being dismantled. In this context, "consultation" risks becoming procedural rather than substantive. The IESO itself shows that consultation and EA processes occur structurally late in the transmission development sequence.[8]

ORA submits that in a climate-disrupted future, Ontario cannot afford late-stage, project-by-project mitigation of impacts that are cumulative, regional, and irreversible.

Finally, ORA emphasizes that the Province's "Energy Superpower" agenda has not been democratically mandated by ratepayers and should not be embedded into bulk planning by default. Expansion planning must be anchored in verified Ontario need, full lifecycle costs, and risk-managed resilience — not export ambition or industrial acceleration narratives. Where transmission reinforcements are necessary, ORA supports them — but only where need is demonstrated and alternatives have been fairly assessed.

ORA Recommendations:

1. **IESO must explicitly disclose uncertainty and confidence ranges** for demand forecasts, industrial load assumptions, and system needs underpinning Eastern Bulk Planning recommendations, rather than presenting planning conclusions as settled.
2. **IESO must apply a "non-wires first" test** for all reinforcements (including Belleville and Ottawa), with transparent comparison of conservation, demand response, distributed energy resources, and storage options — including cost, time-to-deliver, and performance under climate extremes.
3. **IESO must integrate climate non-stationarity into planning baselines**, including stress-testing under drought, flood, heat, and watershed volatility scenarios, and must discontinue reliance on "normal weather" assumptions that exclude climate change.
4. **IESO must not treat new hydropower development as an assumed or preferred pathway** for meeting bulk system needs. Hydropower must not be promoted as "non-emitting" without full transparency about methane emissions, climate vulnerability, ecological impacts, and long-term liabilities.
5. **IESO must explicitly assess induced development** and enabling impacts of transmission corridors (i.e., development the infrastructure is designed to unlock), rather than limiting analysis to short-term reliability needs.
6. **IESO must support and require credible cumulative-effects analysis at an appropriate scale**, including watershed-scale impacts to freshwater ecosystems and interconnected landscapes, rather than relying on narrow project footprint analysis.
7. **IESO and the Province must ensure that Indigenous engagement is early, substantive, and rights-respecting**, with clear disclosure of long-term environmental and financial liabilities (including decommissioning obligations), and not framed primarily through equity participation opportunities.
8. **OEB oversight of need and prudence must be strengthened**, with explicit consideration of climate resilience, cumulative effects, ratepayer risk, and alternatives — not solely engineering deliverability.

Ontario cannot plan a 2050 electricity system using yesterday's climate. The IESO must plan for resilience, not rhetoric — and for Ontario's needs, not an 'Energy Superpower' export agenda.

Finally, ORA is deeply concerned that both the IESO and the Ministry of Energy continue to promote hydropower as "clean" and "non-emitting" while effectively disregarding more than three decades of scientific literature documenting greenhouse gas emissions from reservoirs and headponds, particularly methane. This ongoing institutional refusal to align planning and procurement with established evidence is no longer merely a policy problem — it is a governance and liability risk. As climate disclosure standards tighten and greenwashing scrutiny increases, Ontario's continued reliance on misleading hydropower emissions narratives exposes the Province, system planners, and proponents to escalating reputational, financial, and legal consequences.

Linda Heron, Chair
Ontario Rivers Alliance

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[1] *Ontario Energy Board Announces Changes to Electricity Prices for Households, Small Businesses and Farms. November 1, 2025: Regulated Price Plan for households, small business and farms will change. Winter Time-of-Use hours and the change in threshold for residential customers on Tiered pricing will also take effect. Online: https://www.oeb.ca/newsroom/2025/ontario-energy-board-announces-changes-electricity-prices-households-small-businesses?utm_source=chatgpt.com*

[2] *Massive Increase in Nuclear Power Rates—Welcome to 2026! Ontario Clean Air Alliance. Online: https://www.cleanairalliance.org/nuclear-power-rates/?utm_source=chatgpt.com*

[3] *Annual Planning Outlook, Ontario's electricity system needs: 2026-2050, April 2025. Online: https://ieso.ca/-/media/Files/IESO/Document-Library/planning-forecasts/apo/2025/2025-Annual-Planning-Outlook.pdf*

[4] *Ontario Provincial Climate Change Impact Assessment, Technical Report, January 2023. Online: https://www.ontario.ca/files/2023-11/mecp-ontario-provincial-climate-change-impact-assessment-en-2023-11-21.pdf*

[5] *Soued, C., Harrison, J.A., Mercier-Blais, S. et al. Reservoir CO_2 and CH_4 emissions and their climate impact over the period 1900–2060. Nature Geoscience 15 (2022), 700–705. https://doi.org/10.1038/s41561-022-01004-2*

[6] *12 December 2025 Presentation: Quarterly Bulk Update, Eastern Ontario Bulk Study, South and Central Bulk Study. Online: https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/bulk-planning/BP-20251212-presentation.pdf*

[7] *Annual Planning Outlook, Ontario's electricity system needs: 2026-2050, April 2025. Online: https://ieso.ca/-/media/Files/IESO/Document-Library/planning-forecasts/apo/2025/2025-Annual-Planning-Outlook.pdf*

[8] *12 December 2025 Presentation: Quarterly Bulk Update, Eastern Ontario Bulk Study, South and Central Bulk Study. Online: https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/bulk-planning/BP-20251212-presentation.pdf*