# Feedback Form

## Eastern Ontario Bulk Planning Update Webinar

### Feedback Provided by:


Name: Brigid Rowan

Title: Senior Economist, Econalysis Consulting Services

Organization: On behalf of the Power Workers' Union (PWU)

Email: [redacted]


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To promote transparency, the submitted feedback will be posted on the Eastern Ontario Bulk Plan engagement webpage unless otherwise requested by the sender.

The Independent Electricity System Operator (IESO) is seeking feedback following the May 27, 2026, presentation of the draft recommendations for Eastern Ontario Bulk Plan. A copy of the presentations as well as recordings of the sessions are available on the engagement web page.

**Please submit feedback to engagement@ieso.ca by June 17, 2026.**

## Eastern Ontario Bulk Plan - Feedback

The May 27 2026, webinar focused on the draft Eastern Ontario Bulk Plan recommendations as presented. With the plan objectives and scope established, we are seeking feedback on clarity, understanding, and considerations important to note as the plan moves toward finalization.

| Question | Feedback |
|---|---|
| What additional data or context would help provide more clarity and for consideration in the final report? | See General Comments/Feedback |
| What questions or concerns do you have about the draft recommendations that the IESO might consider in future planning activities? | See General Comments/Feedback |
| What additional data or local considerations should the IESO be aware of in finalizing the draft recommendations, or for future planning? | See General Comments/Feedback |

## General Comments/Feedback

The feedback in this section is responsive to the above three specific topics and questions. These issues are interrelated and broadly relevant, and are therefore presented together.

As elaborated below, the PWU continues to be very concerned that IESO Planning Processes (including Eastern Ontario Bulk Planning, Bulk Planning for South and Central Ontario and related Regional Electricity Planning (notably in the GTA East and West Regions)) are not based on sufficiently high-growth demand scenarios, and therefore may not result in the level of planning and infrastructure needed to ensure reliability under higher-demand scenarios.

The Presentation[1] explains that the Eastern Ontario Bulk Plan is shaped by the ongoing Engagement Process, including IESO Responses to the feedback previously provided by PWU and other Participants. The feedback previously provided by the PWU on January 23, 2026 is resubmitted in the footnote below for reference.[2]

As preamble for more specific feedback set out below, we will first repeat and summarize some key aspects of the feedback previously provided on Eastern Ontario Bulk Planning, since this feedback is especially relevant to (and reinforced by) the May 27, 2026 Quarterly Bulk Update, as well as related Regional Electricity Planning.

The PWU has concluded that current IESO demand forecasts significantly underestimate the scale and urgency of Ontario's electrification required to avert an electricity crisis and support economic growth. This systematic underestimation of Ontario's electricity demand has material implications for system planning, resulting in a grid that is less robust and less prepared for emerging demand pressures.

As expressed in our January 23, 2026 Feedback,[3] this chronic underestimation of Ontario's electricity demand has important implications for bulk planning and robustness of the grid as demand increases. Page 9 of the December 2025 Presentation illustrates the Energy Adequacy Outlook under the Reference 2026 APO forecast, which does not include a high-demand scenario. Even under this lower forecast, a huge gap between supply and demand opens up from 2031 onward. Consequently, significant transmission capacity will also be required rapidly to integrate all the needed supply. Given the looming capacity crunch, greater transmission capacity will also be required to improve the robustness of the grid, so that supply anywhere in the province can serve demand anywhere in the province.

In Ontario's current high demand growth environment, the costs/risks of underbuilding electricity infrastructure are much higher than the costs/risks of rightsizing (or upsizing) infrastructure. Planning should therefore prioritize sufficient and timely capacity to accommodate high-growth scenarios, rather than optimizing narrowly around central forecasts.

As indicated in our January 23, 2026 Feedback:

In the Eastern Ontario bulk planning, the IESO should clearly identify the specific transmission projects (and their timing) required for specific demand scenarios in

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[1] Quarterly Bulk Update: Eastern Ontario Bulk Plan, May 27, 2026, especially pp. 21, 57-63. https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/bulk-planning/eobp-20260527-presentation.pdf The discussion of Feedback and Responses – by Theme in the Presentation (pp. 58-63 is (in part) based on and summarizes the more detailed and specific Feedback and IESO Reponses, March 6, 2026. https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/bulk-planning/eobp-20260306-response-to-feedback.pdf

[2] Bulk Planning Update Webinar (Eastern Ontario Bulk Plan) – December 12, 2025, Feedback of the Power Workers' Union, January 23, 2026 https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/bulk-planning/eobp-20251212-feedback-form-Power-Workers-Union.pdf

[3] See previous footnote.

> Belleville and Ottawa. The PWU recommends that bulk planning should accommodate a high growth scenario (as per the Priority 4 in Priorities for Ontario's Integrated Energy Planning, in Energy for Generations, p. 119). Moreover, the PWU's analyses have concluded that the demand forecast should be substantially higher than the high-growth demand forecast referenced in Energy for Generations, as well as the 2025 and 2026 APO Demand Scenarios illustrated on page 6 of the Presentation[4] associated with the Eastern Ontario Bulk Planning Study.
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> […]
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> **Therefore, the PWU is concerned that even the IESO's High Growth Forecasts for Ottawa and Belleville (as outlined in the December 2025 Presentation) will be insufficient.**[5]

The PWU continues to be concerned that even the IESO's High Growth Forecasts for Ottawa and Belleville (as outlined in the December 2025 Presentation) will be insufficient.

For the reasons set out above, the PWU recommends that the IESO plan, at a minimum for its High Growth forecast, which has determined a capacity need of 300 MW for Belleville. Under the reference forecast, the capacity need appears to be significantly lower.[6] Given that the IESO's High Growth Forecast is still lower than the PWU's electricity demand forecast, it is quite possible that the forecast of 300MW of additional capacity need for Belleville will be insufficient.

However, the IESO's recommendation on p. 43 of the Presentation (Supporting Belleville – Napanee Sub-Region) does not plan for the High-Growth Scenario after the mid-2030s, with the LMC just exceeding the Reference Scenario. The PWU appreciates the consideration of "Triggers" on p. 45, but there is little explanation of how these would be operationalized, and if they could be built on time to meet capacity shortfalls.

Similarly, for the reasons set out in the General Comments below, the PWU recommends that the IESO plan, at a minimum, for a High Growth Forecast, which has determined a capacity need for Ottawa of about 2450 MW by 2043. According to p. 21 of the Dec 2025 Presentation, "the projected need ranges from approximately 550 MW to 2,450 MW by 2043, depending on the demand forecast scenario." In our January 2023 feedback, we noted that this is a very big range and a very significant capacity gap. On p. 24 of the May 2026 Presentation, it appears that the range between the Reference and High Growth Scenarios continues to be large with a very significant capacity gap.[7] Given that the IESO's High Growth Forecast is still lower than the PWU's electricity demand forecast, it is quite possible that the forecast of 2450MW of additional capacity for Ottawa will be insufficient.

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[4] Quarterly Bulk Update Eastern Ontario Bulk Study South and Central Bulk Study, Dec 12, 2025, p. 20. https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/bulk-planning/BP-20251212-presentation.pdf

[5] See footnote 2.

[6] We also note that it is difficult to derive the exact numbers based on Demand Forecast and Load Meeting Capability bar graphs on pp 23 and 24 of May 27, 2026 Presentation.

[7] See previous footnote.

However, the IESO's recommendation on p. 48 of the Presentation (Meeting Ottawa Needs) leaves Ottawa's demand exceeding its system capability for all the APO scenarios until 2032 for Summer and 2034 for winter. The PWU appreciates the consideration of Phase 1 and Phase 2 (which would cover a High Electrification scenario) and "Triggers" on p. 50, but we require more explanation of how these would be operationalized, and if they could be built on time to meet capacity shortfalls. Nonetheless, the PWU approves the planning for Phases 1 and 2 and urges the IESO to ensure that these can be implemented in a timely way considering the magnitude of the potential shortfalls.