

Feedback Form

North of Sudbury Bulk Planning Update Webinar

Feedback Provided by:

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Organization: Ontario Rivers Alliance

Email: [REDACTED]

Date: 10 June 2026

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

The Independent Electricity System Operator (IESO) is seeking feedback following the May 20, 2026, presentation of the draft recommendations for North of Sudbury 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 10, 2026.

North of Sudbury Bulk Plan - Feedback

The May 20, 2026, webinar focused on the draft North of Sudbury 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
<p>What additional data or context would help provide more clarity and for consideration in the final report?</p>	<p>Bulk Plans are presented in isolation, but ratepayers and taxpayers fund the full provincial portfolio simultaneously. The Phase 1 NOS transmission recommendation carries a planning-level estimate of \$3.2 billion. The full NOS plan, including Phases 2 and 3, represents a potential commitment of \$6.2 billion. The Province has separately announced \$4.7 billion in OPG hydro refurbishments and expansions.³ These figures sit alongside the South and Central Bulk Plan (SCBP) estimate of \$9.8 billion, multiple other bulk and regional plans, 1,800 kilometres of new transmission lines, nuclear refurbishments, new nuclear, including small modular reactors, the Northern Hydro Program, Small Hydro Program, Long Term (LT)2 contracts with 20-year terms, Long Lead-Time (LLT) hydropower with various incentives, environmental benefits and contracts with 40-year terms, none of which have been presented to the public as a cumulative cost figure.</p> <p>The IESO's own Capacity Expansion Scenario, Costs and Emissions Module (2025 APO, updated February 2026) documents total system costs rising from approximately \$25.6 billion per year in 2025 to approximately \$46.5 billion per year by 2050.⁴ The standard response, that per-unit costs will be "fairly stable" as demand grows, does not answer the question. Stable per-unit costs applied to a doubling of the demand base mean that total annual electricity expenditure by Ontario households and businesses also roughly doubles. Ontario ratepayers and taxpayers are funding all of it without ever seeing or being warned of the aggregate bill.</p> <p>Second, climate-stress-tested hydroelectric output projections, using P50 and P10 water availability scenarios under the Ontario Provincial Climate Change Impact Assessment (OCCIA 2023) conditions, for all existing and proposed hydroelectric supplies in the NOS planning stack, including the approximately 1,700 MW of existing hydro and</p>

Question	Feedback
	<p>the proposed 430 MW of Moose River Basin additions. These projections should cover multi-year drought sequences, not single-year averages, and should be published as part of the plan before finalization.</p> <p>Third, the application of IESO's August 2025 Hybrid Resource Equivalency Assessment (EN-5) methodology to the NOS non-wires alternatives (NWA) screening, evaluating wind-solar-battery storage portfolios as integrated systems rather than evaluating each resource type in isolation. The current NWA screening is methodologically inconsistent with EN-5.</p> <p>Fourth, a scenario-sensitivity analysis identifying which specific Phase 1 elements are driven by the reference demand forecast versus the high-demand scenario and quantifying the stranded-asset exposure to ratepayers if demand tracks the low scenario through the planning horizon.</p> <p>The primary driver of demand growth, mining and industrial electrification, is project-dependent and is not a committed load.</p> <p>Fifth, formal disclosure of the plan's dependency on the Essa-to-Hanmer 500 kV transmission line. The May 20 webinar confirmed that "this study does assume that that line is going to be in service." A participant who serves on the oversight committee for that line stated at the same webinar that it is "not moving forward just yet." This dependency is material to the plan's reliability assumptions and must be disclosed.</p>
<p>What questions or concerns do you have about the draft recommendations that the IESO might consider in future planning activities?</p>	<p>See ORA's concerns and recommendations below in the General Comments section.</p>
<p>What additional data or local considerations should the IESO be aware of in finalizing the draft recommendations, or for future planning?</p>	<p>See ORA's concerns and recommendations below in the General Comments section.</p>

General Comments/Feedback:

Ontario Rivers Alliance (ORA) is a not-for-profit grassroots organization with a mission to protect, conserve, and restore Ontario rivers and the watersheds that sustain them. ORA submits these comments on the draft North of Sudbury Bulk Plan (NOS) recommendations in the public interest of Ontario ratepayers and taxpayers, in the interest of sound and transparent electricity planning, and in recognition of the legal and environmental rights of communities whose rivers and watersheds are directly affected by the electricity generation investments this plan is designed to enable.

The IESO's own planning documents are the appropriate starting point. The May 20, 2026, presentation states on slide 24: "A large share of supply resources in the area is hydroelectric, which is energy-limited and cannot be relied on at full output in all hours."¹ Slide 30 states: "Hydroelectric supply resources are energy-limited and cannot be relied on to meet demand in all hours or conditions."¹ The planning engineer presenting the NOS plan confirmed verbally at the May 20 webinar that "These hydro facilities are largely river-based, so they have limited storage, meaning their output depends on water availability, so they cannot be relied on at all times."²

Against that backdrop, the Province's April 9, 2025, media release describes the proposed Nine Mile Rapids and Grand Rapids generating stations, together up to 430 MW, as providing "affordable, reliable, and clean electricity" and "24/7 power for families and businesses," and characterizes hydroelectricity as "a reliable source of emissions-free power."³ ORA places both sets of statements on the formal planning and procurement record. The contradiction between what the IESO's own planning staff have documented and what the Province and industry have announced to the public is not a minor discrepancy. It goes to the core of whether the plan's generation assumptions are honest and forthright, and whether the long-term ratepayer commitments contemplated here rest on an accurate foundation.

1. Cumulative Ratepayer and Taxpayer Cost

Bulk Plans are presented in isolation, but ratepayers and taxpayers fund the full provincial portfolio simultaneously. The Phase 1 NOS transmission recommendation carries a planning-level estimate of \$3.2 billion. The full NOS plan, including Phases 2 and 3, represents a potential commitment of \$6.2 billion. The Province has separately announced \$4.7 billion in OPG hydro refurbishments and expansions.³ These figures sit alongside the South and Central Bulk Plan (SCBP) estimate of \$9.8 billion, multiple other bulk and regional plans, 1,800 kilometres of new transmission lines, nuclear refurbishments, new nuclear, including small modular reactors, the Northern Hydro Program, Small Hydro Program, Long Term (LT)2 contracts with 20-year terms, Long Lead-Time (LLT) hydropower with various incentives, environmental benefits and contracts with 40-year terms, none of which have been presented to the public as a cumulative cost figure.

The IESO's own Capacity Expansion Scenario, Costs and Emissions Module (2025 APO, updated February 2026) documents total system costs rising from approximately \$25.6 billion per year in 2025 to approximately \$46.5 billion per year by 2050.⁴ The standard response, that per-unit costs will be "fairly stable" as demand grows, does not answer the question. Stable per-unit costs applied to a doubling of the demand base mean that total annual electricity expenditure by

Ontario households and businesses also roughly doubles. Ontario ratepayers and taxpayers are funding all of it without ever seeing or being warned of the aggregate bill.

ORA Recommendation 1:

That the IESO, before the NOS Bulk Plan is finalized, publish or formally request from the Ministry a cumulative ratepayer and taxpayer cost analysis covering all active and planned provincial electricity infrastructure programs, expressed in total capital terms and in projected ratepayer impact per kilowatt-hour and per average Ontario household through 2050.

2. IESO's Own Evidence vs. Ministerial Direction

The IESO completed the Hybrid Resource Equivalency Assessment (EN-5) in August 2025, demonstrating that wind, solar, and battery storage portfolios can meet 99.5 to 99.98% of peak load and 100% of base load with high reliability at costs that are competitive with gas and SMRs.⁵ On April 16, 2026, Minister Lecce directed the IESO to proceed with energy-limited and higher cost hydropower procurement through the LLT Request For Proposals (RFP) without incorporating that analysis.⁶

The NOS engagement described a Non-Wires Alternatives (NWA) screening that evaluated each resource type individually, stating that "there isn't enough surplus of energy available to meet both demand and the charging of the batteries at the same time. So, in terms of capacity and energy requirements, batteries alone are not sufficient."² This methodology is inconsistent with EN-5, which evaluated hybrid portfolios rather than single or combined resource deployments. It is precisely the gap that paired wind generation addresses. Wind generation is strongest overnight, when solar is absent and when the NOS area's hydro deficit is most acute, as the August overnight chart on slide 24 documents.

The plan then separately recommends that "new solar resources capable of controlling voltage at all hours, including when not generating, can help manage high-voltage conditions and improve system operability" in this region. If solar with grid-support capability is a valid planning recommendation for the NOS area, it warrants evaluation as a component of a hybrid NWA portfolio under the EN-5 framework. It was not evaluated in that way. The internal contradiction between the NWA dismissal of solar and the supply section's recommendation of solar for voltage support is on the NOS planning record. Wind, solar and Long Duration Energy Storage (LDES) could save billions in the cost of transmission line construction extending into the Moose River Basin, as well as the remote First Nation communities in Northwestern Ontario.

The failure to apply the EN-5 hybrid portfolio methodology is consequential beyond the Moose River Basin generation question. The NOS Phase 1 plan proposes new 230 kV circuits spanning hundreds of kilometres into remote northern Ontario, including the Timmins-to-Pinard corridor and the Iroquois Falls-to-Temiskaming Shores path. Wind, solar, and battery storage resources can be sited at or near load centres, including within and adjacent to remote First Nation communities across the north, delivering electricity services without requiring long-distance high-voltage transmission infrastructure through sensitive boreal environments.

A hybrid portfolio approach of the kind EN-5 demonstrates is viable and could serve those communities directly, supporting energy self-determination while avoiding or substantially deferring portions of the Phase 1 transmission investment.

The same principle applies to transmission proposals being advanced in northwestern Ontario: distributed hybrid generation near load could obviate the need for hundreds of kilometres of new high-voltage corridors at capital costs in the billions of dollars. The cost differential between this approach and the current plan has never been presented to ratepayers or to the communities whose territories those lines would cross.

ORA places this alternative pathway on the formal planning and procurement record as warranting urgent analysis before Phase 1 is committed.

ORA Recommendation 2:

Apply the EN-5 hybrid portfolio methodology to the NOS NWA screening, evaluating wind-solar storage combinations as an integrated system.

ORA Recommendation 3:

The IESO formally advise the Minister of the ratepayer-risk implications of proceeding with Moose River Basin hydro transmission investment without this analysis and disclosure of the cost differential between hydropower procurement and the NWA and LDES alternatives, the Hybrid Report identified as viable.

3. Riverine Sustainability and Hydropower Output in a Warming Climate

This section addresses the price Ontario ratepayers and taxpayers will pay for committing to water-dependent generation assets without stress-testing those assets against the operating conditions they will actually face over the life of a 20- to 40-year contract.

The Ontario Provincial Climate Change Impact Assessment (OCCIA 2023), the Province's own commissioned science, classifies electricity generation infrastructure as among the highest-risk categories across all future time periods.⁷ The assessment projects increasing drought frequency and severity, hydrological volatility, warmer waters, and reduced precipitation reliability across northern Ontario watersheds. The same government that published this OCCIA 2023 assessment is now advancing large-scale hydropower investment in northern Ontario river systems without disclosing how those assets will perform under the climate conditions projected by its own science.

The national operational record documents the consequences of that gap. Statistics Canada's electricity year-in-review series records three consecutive years of record or near-record-low national hydroelectric generation. In 2023, Canada's hottest summer since 1940, Hydro-Quebec cut electricity exports to preserve reservoir levels.⁸ In 2024, national hydroelectric generation fell to 341.8 million MWh, 4.9 percent below 2023, with Quebec's output down 6.4 percent, Manitoba's down 8.9 percent, and Newfoundland's down 8.6 percent; Canada became a net electricity importer for the first time in recorded history.⁹ In 2025, national output recovered only marginally to 343.4 million MWh, with drought affecting approximately 85 percent of the country; Canada was again a net electricity importer, and the hydroelectric share of national generation fell to 54.9 percent, the lowest since the current data series was established.¹⁰

These are not projections. They are the operational record of the resource Ontario proposes to expand through the LLT RFP and the NOS transmission plan.

The financial consequences are documented in audited corporate reports. Manitoba Hydro reported a \$157 million net loss attributable to drought in FY2023-24¹¹ and a \$63 million net loss attributable to drought in FY2024-25,¹² a combined \$220 million across two consecutive fiscal years. Manitoba Hydro's ratepayers and the provincial treasury bore those losses. Ontario ratepayers face analogous exposure under any long-term hydropower contract if water availability tracks the trend the operational record documents.

The NOS planning area currently hosts approximately 1,700 MW of existing hydroelectric generation, which the IESO's own planning documents confirm is energy-limited and cannot be relied upon at full output. The plan proposes adding a further 430 MW of the same resource type in the same watershed system. The Moose River Basin drains into James Bay, a watershed already experiencing altered precipitation patterns and reduced late-summer water availability. Building new reservoir capacity on a river system that is demonstrably unreliable under current climate conditions and projecting that reliability forward through conditions Ontario's own science describes as increasingly severe is a risk that has not been disclosed, stress-tested, or costed for ratepayers.

ORA Recommendation 4:

Before the NOS Bulk Plan is finalized, publish climate-stress-tested hydroelectric output projections using P50 and P10 water availability scenarios under OCCIA 2023 conditions for all existing and proposed hydroelectric supply in the NOS planning stack. These projections should reflect multi-year drought sequences, not single-year averages, and the results should be disclosed to ratepayers as part of the plan's cost-risk analysis.

The climate risk to hydropower infrastructure operates in both directions. Drought reduces output, and that record is documented above. Extreme rain events can pose the opposite hazard, and when reservoirs are already full at the onset of a spring freshet, dam operators have no choice but to release the water. That discharge does not flow only downstream; water can also be backed up into upstream properties and communities within the reservoir's influence.

The spring of 2026 was among the worst in decades for flooding across northeastern Ontario and numerous other areas of the province, breaking records and prompting emergency declarations in many watersheds. For instance, the Municipality of French River declared a State of Emergency this April due to rising water levels from dam discharges and rapid snowmelt combined with significant rainfall, which impacted infrastructure and stretched local resources. Ontario Power Generation's spokesperson described the constraint explicitly: dam operations require balancing "public safety, limited reservoir storage capacity, environmental stewardship, and local water management plans and agreements."¹³ When inflow during a severe freshet exceeds what can be stored, it is discharged and/or overtops the dam, and the communities above and below the dam bear the consequences.

The Insurance Bureau of Canada reports that flooding caused over \$4 billion in insured losses across Canada in 2024 and over \$1 billion in 2025.¹³ The spring of 2026 broke flood records in numerous watersheds across Ontario; the full cost of insured and uninsured losses has not yet been tallied. At scale, dam failure poses risks of fatalities and catastrophic property damage, compounding the costs. The OCCIA 2023 classification of electricity generation infrastructure as the highest-risk category across all future time periods encompasses both failure modes: drought

reducing output and extreme precipitation overwhelming storage capacity.⁷ The removal of the Comprehensive Environmental Assessment pathway under Bill 5 eliminates the one process that would require a systematic assessment of upstream and downstream flooding risk to communities, including First Nations communities, before construction begins on new facilities in the Moose River Basin.

ORA places the OCCIA 2023 assessment, the Statistics Canada operational record, the Manitoba Hydro audited losses, and the 2026 spring flood record on the formal planning and procurement record as evidence that hydropower climate vulnerability is not a theoretical future concern. It is an active, measurable risk occurring now, at scale, in operating hydroelectric systems and the communities they affect across Canada.

ORA Recommendation 5:

The IESO formally advise the Minister that the proposed Moose River Basin hydroelectric developments pose a material flood risk to both upstream and downstream communities, including First Nations communities, arising from the constrained storage capacity of reservoirs during severe spring freshets and extreme rain events.

ORA Recommendation 6:

A comprehensive flood risk assessment, covering upstream backwater and downstream discharge flooding effects, including dam failure consequences, must be completed for all affected communities in the Moose River Basin watershed before Phase 1 transmission-enabling infrastructure is committed. This assessment should be informed by the 2026 spring flood record in northeastern Ontario and the climate projections in OCCIA 2023, which classifies electricity generation infrastructure as the highest-risk category across all future time periods.

4. Non-Emitting Misinformation

The NOS Bulk Plan and the Province's April 9, 2025, media release both characterize the proposed Moose River Basin hydroelectric stations as "non-emitting" or "emissions-free." This characterization is inconsistent with the peer-reviewed scientific literature, with the Intergovernmental Panel on Climate Change (IPCC) National Inventory Guidelines, or with the operational record of reservoir-based hydropower.

Water impounded behind a dam generates greenhouse gases through well-understood biogeochemical processes: decomposition of flooded biomass, continuous inputs of organic matter, and sediment-driven methane production. These are measured pathways, not assumptions. Deemer et al. (2016) synthesized greenhouse gas emissions from 267 reservoirs globally and documented net CO₂, CH₄, and N₂O emissions from reservoir water surfaces over their full lifecycle.¹⁴ Soued et al. (2022) examined the cumulative global surface area of 9,195 reservoirs in 4 different climate zones (boreal, temperate, subtropical and tropical) around the world, and documented that reservoir CO₂ and CH₄ emissions persist over the 1900-2060 period, driven by ongoing biogeochemical processes that continue for the full operating life of a dam.¹⁵ Keller et al. (2021) analyzed the global carbon budget of reservoirs and found that hydroelectric reservoirs dominate total reservoir greenhouse gas emissions; under certain conditions,

measured methane emission intensities can be comparable to those from gas-fired generation on a lifecycle basis.¹⁶

The IPCC's 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories establishes that hydropower's anthropogenic fugitive emissions of CO₂, CH₄, and N₂O, where measurable, should be reported in source category 1.B.3 under Energy in national greenhouse gas inventories.¹⁷ Canada currently reports reservoir emissions under Flooded Land (AFOLU), not under Energy, resulting in systematic under-attribution of the electricity sector's emissions profile.

Characterizing new reservoir-based hydropower as "emissions-free" while suppressing this peer-reviewed and IPCC-documented record misleads ratepayers and policy-makers who are comparing the full lifecycle costs and environmental footprints of competing supply options. ORA places the complete peer-reviewed GHG record and the IPCC reporting framework on the formal planning and procurement record.

Turning a blind eye to the significant and ongoing environmental impacts of waterpower, and to the scientific evidence that contradicts claims of non-emitting, emission-free, clean, green, and renewable hydropower, brings to mind the conduct of the tobacco and oil and gas industries in the 1960s and 1980s. The tobacco industry knew the dangers of smoking, yet still misled the public into believing it was safe. The oil and gas industry knew for decades that its emissions would drive dangerous climate change, and yet continued to suppress and misrepresent that evidence.

The waterpower industry must not be permitted to repeat that pattern. ORA calls on the IESO to ensure that industry claims of non-emitting and emissions-free hydropower are not adopted, endorsed, or repeated on the provincial planning and procurement record.

ORA Recommendation 7:

The IESO cease characterizing new reservoir-based hydropower as "non-emitting" or "emissions-free" in planning documents and procurement communications and formally request that the Ministry align its public communications about the proposed Moose River Basin stations with the peer-reviewed evidence and IPCC inventory guidelines that ORA places on the planning record herein.

5. Dismantling of Environmental Oversight

The proposed Nine Mile Rapids Generating Station, at 256 MW, is of a scale that, under the previous framework, would have required a Comprehensive Environmental Assessment (Comprehensive EA) in Ontario. The Ontario government's passage of Bill 5 (Protect Ontario by Unleashing Our Economy Act) created streamlined approval pathways that reduce or eliminate this requirement for designated projects. The reference in the April 9, 2025, media release to developing "a streamlined process for hydro development," including the statement by Chief Peter Wesley of Moose Cree First Nation that the parties "will develop a streamlined process for hydro development, ensuring environmental impacts are evaluated and understood by our community members," confirms that standard independent environmental review will not apply to these projects.³

Concurrently, the Ontario Waterpower Association (OWA) has revised the Class Environmental Assessment for Waterpower Projects, the pre-approved planning process for waterpower facilities, in ways that reduce, and in material respects eliminate, the assurance of meaningful public consultation. The LLT RFP procurement process is advancing in parallel with these regulatory changes, meaning that hydropower contracts could be awarded without any independent environmental review or public consultation occurring.

The combined effect of these three concurrent changes, Comprehensive EA removal, Class EA public consultation reduction, and LLT RFP procurement advancing in a reduced-oversight environment, is that Ontario ratepayers and the public are being asked to fund long-term hydropower contracts that are subject to extended drought and extreme rain and snow melt events on facilities whose environmental risks have not been independently assessed and whose affected communities have had no meaningful opportunity to participate in the decision. This increases the legal, reputational, and project-delivery risk to ratepayers from any generation investment enabled by the NOS Phase 1 transmission recommendation.

ORA does not ask the IESO to adjudicate environmental legislation or regulatory policy, which is outside the IESO's mandate. ORA places these developments on the formal planning and procurement record as material factors in the risk profile of the NOS plan's generation assumptions.

ORA Recommendation 8:

The IESO formally advise the Minister that the removal of the Comprehensive Environmental Assessment requirements, the streamlining of the Class Environmental Assessment for Waterpower to reduce public consultation, and the concurrent advancement of LLT RFP hydropower procurement represent a combination of factors that increase the legal, financial, and social-licence risk to Ontario ratepayers associated with the Moose River Basin generation component of the NOS Phase 1 plan.

6. Attawapiskat First Nation, the Moose River Basin, and the Constitutional Challenge

Phase 1 of the NOS Bulk Plan is explicitly designed to enable the development of Nine Mile Rapids and Grand Rapids generating stations in the Moose River Basin. The Moose River watershed is the territory of the Attawapiskat First Nation, among other communities. Attawapiskat First Nation is among the fourteen First Nations that have filed a constitutional challenge before the Ontario Superior Court of Justice, seeking declarations that both Ontario Bill 5 and federal Bill C-5 are unconstitutional and injunctions against their application.^{18, 19, 20} Both statutes enable infrastructure development through approval pathways that can bypass standard environmental safeguards and, critically, free, prior, and informed consent (FPIC) obligations.

Chief Sylvia Koostachin-Metatawabin of Attawapiskat First Nation has stated that her community's way of life "is not a pawn in some political game."²⁰ Her community is before the courts to protect the constitutional rights that make meaningful consent possible. Any Bulk Plan that proceeds as though this challenge does not exist is not adequately disclosing the legal risk embedded in its generation assumptions.

The May 20 webinar illustrates the gap in the engagement record. When Eileen from Henley Inlet First Nation asked directly whether First Nations had been consulted on the recommended

transmission lines, the response was inaudible to webinar participants. However, the facilitator characterized the IESO's response as an offer to follow up bilaterally after the call. Bilateral post-planning follow-up is not a consultation and is not FPIC.

Economic participation agreements do not substitute for constitutionally sufficient consultation on whether the legal process enabling a project is itself valid. The Letters of Intent signed by Taykwa Tagamou Nation and Moose Cree First Nation with OPG³ reflect those nations' engagement in a co-planning process. They do not preclude other First Nations, including Attawapiskat First Nation, from challenging the constitutionality of the approval framework under which that development would proceed. Courts have found both simultaneously: a community may hold an economic interest in a project and simultaneously maintain that the legal process enabling it violated their constitutional rights.

If an injunction is granted or either bill is found unconstitutional, project approvals advanced under that framework face significant legal exposure. A Bulk Plan recommending \$3.2 billion of transmission infrastructure to enable generation in a territory subject to a live constitutional challenge is required to disclose that challenge as a material planning uncertainty.

ORA Recommendation 9:

The IESO formally acknowledge the Bill 5/C-5 constitutional challenge as a material planning and procurement uncertainty affecting the Moose River Basin hydroelectric component of Phase 1, discloses this risk on the planning record, and formally advises the Minister of its implications for project delivery timelines, contract security, and ratepayer exposure.

7. Demand Uncertainty, Stranded-Asset Risk, and Planning Dependencies

The NOS demand forecast projects approximately 80 percent growth by 2050 under the reference scenario, with a range of scenarios from low to high. The primary driver of growth is mining and industrial electrification, specifically future mines under consideration in the Timmins, Kirkland Lake, and Pinard areas. These are not committed loads. The plan itself acknowledges that Phase 1 transmission enables demand growth "across all scenarios," yet the recommendation documents a planning estimate of \$3.2 billion and designates Phase 1 as implementation-ready without disaggregating which elements are strictly necessary under the reference scenario and which are justified only under the high scenario.

Ontario's electricity planning history includes significant demand overestimation events whose stranded-asset costs ratepayers continue to carry. When a Bulk Plan's demand uncertainty range spans scenarios from low to high, and the primary demand driver is discretionary future industrial investment, the failure to publish a scenario-sensitivity analysis before committing implementation-ready investments is itself a governance risk to ratepayers.

The plan has a second undisclosed material dependency. The IESO's planning engineer confirmed at the May 20 webinar that "this study does assume that that line is going to be in service," referring to the Essa-to-Hanmer 500 kV transmission line, which addresses the north-south bottleneck between southern and northern Ontario. A participant who serves on the oversight committee for that line responded that it is "not moving forward just yet." If the Essa-Hanmer line is delayed or does not proceed on the assumed timeline, the NOS plan's north-south

power flow assumptions and the reliability case for Phase 1 require revision. This dependency is not disclosed in the draft recommendations.

ORA Recommendation 10:

Before the NOS plan is finalized, IESO publish a scenario-sensitivity analysis identifying which specific Phase 1 elements are driven by the reference forecast versus the high demand scenario and quantifying the stranded-asset exposure to ratepayers if demand tracks the low scenario through the planning horizon.

ORA Recommendation 11:

The final report formally discloses the dependency on the Essa-to-Hanmer 500 kV transmission line and its current implementation status as a material planning assumption.

In Conclusion:

Ontario cannot build a genuinely reliable, affordable, and environmentally responsible electricity future on a supply resource its own planning documents describe as energy-limited and incapable of delivering at full capacity on demand, without disclosing to ratepayers the climate vulnerability of that resource, the full cumulative cost of the procurement program that surrounds it, and/or the legal uncertainties that attend its development.

ORA calls on the IESO to ensure that all of the evidence placed on this record is reflected in the final North of Sudbury Bulk Plan report and formally conveyed to the Minister.

Respectfully submitted,

Linda Heron

Chair, Ontario Rivers Alliance


www.OntarioRiversAlliance.ca

End Notes:

- 1 IESO. 2026. *North of Sudbury Bulk Plan — Update Webinar Presentation*. May 20, 2026. <https://ieso.ca/-/media/Files/IESO/Document-Library/engage/bulk-planning/nsbp-20260520-presentation.pdf>
- 2 IESO. 2026. *North of Sudbury Bulk Plan, Webinar Recording*. May 20, 2026. <https://youtu.be/h7vuhKRT5H0>
- 3 Ontario Ministry of Energy and Mines. 2025. *Ontario Pursuing New Hydroelectric Stations in Northern Ontario*. April 9, 2025. Ontario Newsroom. <https://news.ontario.ca/en/release/1005756/ontario-pursuing-new-hydroelectric-stations-in-northern-ontario>
- 4 IESO. 2025. *Capacity Expansion Scenario, Costs, and Emissions Module. 2025 Annual Planning Outlook (updated February 10, 2026)*. <https://www.ieso.ca/-/media/Files/IESO/Document-Library/planning-forecasts/apo/2025/Capacity-Expansion-Scenario-Costs-and-Emissions-Module.pdf>
- 5 IESO. 2025. *Hybrid Resource Equivalency Assessment. August 2025*. <https://ieso.ca/-/media/Files/IESO/Document-Library/Technical-papers/Hybrid-Resource-Equivalency-Assessment.pdf>

- 6 Lecce, S. (Minister of Energy and Mines, Ontario). 2026. Ministerial Directive to the IESO re: Long Lead-Time RFP. April 16, 2026. <https://www.ieso.ca/-/media/Files/IESO/Document-Library/corporate/ministerial-directives/Directive-from-the-Minister-of-Energy-20260416-LLT-RFP.pdf>
- 7 Ontario Ministry of Environment, Conservation and Parks. 2023. Ontario Provincial Climate Change Impact Assessment (OCCIA 2023). Government of Ontario. <https://www.ontario.ca/page/ontario-provincial-climate-change-impact-assessment>
- 8 Statistics Canada. 2024. Hydroelectricity generation dries up amid low precipitation and record high temperatures: Electricity year in review 2023. <https://www.statcan.gc.ca/o1/en/plus/5776-hydroelectricity-generation-dries-amid-low-precipitation-and-record-high-temperatures>
- 9 Statistics Canada. 2025. Dry weather dampens overall generation: Electricity year in review, 2024. <https://www.statcan.gc.ca/o1/en/plus/8076-dry-weather-dampens-overall-generation-electricity-year-review-2024>
- 10 Statistics Canada. 2026. Electricity generation from combustibles and renewables sharply increase amid another dry year: Electricity year in review 2025. <https://www.statcan.gc.ca/o1/en/plus/9117-electricity-generation-combustibles-and-renewables-sharply-increase-amid-another-dry-year>
- 11 Manitoba Hydro. 2024. Manitoba Hydro posts \$157 million net loss due to drought: 2023-24 Annual Report. October 2024. <https://www.hydro.mb.ca/articles/2024/10/manitoba-hydro-posts-157-million-net-loss-due-to-drought-2023-24-annual-report/>
- 12 Manitoba Hydro. 2025. Manitoba Hydro posts \$63 million loss due to drought: 2024-25 Annual Report. September 2025. <https://www.hydro.mb.ca/articles/2025/09/manitoba-hydro-posts-63-million-loss-due-to-drought-2024-25-annual-report/>
- 13 Steer, B. 2026. Who controls the water when Ontario's rivers run high. *TimminsToday.com* (Village Media). May 25, 2026. <https://www.timminstoday.com/columns/back-roads-bill/who-controls-the-water-when-ontarios-rivers-run-high-12320807>
- 14 Deemer, B.R., Harrison, J.A., Li, S., et al. 2016. Greenhouse Gas Emissions from Reservoir Water Surfaces: A New Global Synthesis. *BioScience* 66(11): 949-964. <https://academic.oup.com/bioscience/article/66/11/949/2754271>
- 15 Soued, C., Harrison, J.A., Mercier-Blais, S., et al. 2022. Reservoir CO₂ and CH₄ emissions and their climate impact over the period 1900-2060. *Nature Geoscience* 15: 700-705. <https://doi.org/10.1038/s41561-022-01004-2>
- 16 Keller, P.S., Marce, R., Obrador, B., et al. 2021. Global carbon budget of reservoirs dominated by hydroelectric reservoirs. *Nature Geoscience*. <https://doi.org/10.1038/s41561-021-00734-z>
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