Feedback Form

Pathways to Decarbonization – February 24, 2022

Feedback Provided by:

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Following the February 24 engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the items discussed during the webinar. The webinar presentation and recording can be accessed from the engagement web page.

Please submit feedback to engagement@ieso.ca by **March 16**. Please attach research studies or other materials for consideration by the IESO to support your submission.

If you wish to provide confidential feedback, please submit as a separate document, marked "Confidential". Otherwise, to promote transparency, feedback that is not marked "Confidential" will be posted on the engagement webpage.

Policy

Topic	Feedback
Are the assumptions indicated reasonable and comprehensive in terms of scale and timing?	We do not support a cap on investment in energy efficiency, a critically important measure in reducing energy demands, at 3.3-3.9 cents/kWh. It is necessary to make all energy efficiency investments that can meet Ontario's energy needs and price out under OPG's rate for nuclear generated electricity of 10.5 cents/kWh. Likewise we do not support the IESO's plan to arbitrarily limit and cap cost-effective alternative distributed energy resource options to minimize the cost of decarbonizing the electricity grid. In order to be effective, especially at the scale and urgency dictated by our greenhouse gas emissions (GHG) reduction targets, the IESO must utilize every distributed alternative renewable and low carbon energy source possible that can meet Ontario's energy demands at a cost lower than currently paid to OPG for nuclear energy. A comprehensive decarbonization plan must also include proper carbon pricing modelling. The IESO's current plateau of $170 is not an accurate model.

Topic	Feedback
Are there other considerations for the IESO?	We support phase out of gas powered electricity in Ontario, targeting net zero emissions as measured by validated mechanisms, as rapidly as possible before 2050. There should be no investment in adding new gas power capacity. We also support a moratorium on any new nuclear development including opposition to re-building established aging reactors or a new GTA reactor. The exorbitant monetary cost of nuclear energy combined with unacceptable risks of long term storage of byproducts and vulnerability to increasing threats both related to the climate crisis and man-made security threats as currently occurring in Europe make any new investment in nuclear energy unacceptable, other than preventive maintenance/safety of current reactors until retired. This is especially so as safe, renewable energy sources such as solar have now also become the cheapest sources of energy such that both economic and health and safety considerations favour pursuing renewable sources such as solar, wind and hydroelectric. The investments to do so should not be expended in nuclear.

Demand

Topic	Feedback
Are the assumptions indicated reasonable and comprehensive in terms of scale and timing?	The IESO should include the impact of newer alternatives such as use of electric vehicles (EVs) with bidirectional chargers as well as thermal storage options such as thermal storage bricks. EVs with bidirectional chargers could meet all of Ontario's peak power demands at a lower price than gas-powered electricity while thermal storage bricks combined with heat pumps have the potential to decrease peak daytime electricity demands for most homes to near zero. The IESO also should not be considering capping import of hydroelectricity from Manitoba and Quebec or be unwilling to import this energy unless available 100% of all hours of the year especially as OPG's own nuclear facilities do not necessarily provide guaranteed generation for 100% of hours of the year.

Topic	Feedback
Are there other considerations for the IESO?	It may be appropriate to keep Ontario's existing gas power capacity on standby only, not in active use, to serve as an emergency back up supply until 2040.

Resources

Topic	Feedback
Are the assumptions indicated reasonable and comprehensive in terms of scale and timing?	Click or tap here to enter text.

Topic	Feedback
Are there additional data sources that we should consider	Click or tap here to enter text.
Are there other considerations for the IESO?	Click or tap here to enter text.

General Comments/Feedback

In addition to the feedback provided above regarding efficiency, opposition to gas and nuclear powered electricity, support for solar, wind and hydro-powered electricity and reliably meeting peak demand, our organization, CAPE Ontario, advocates for the human health considerations of these energy based decisions. With the applaudable environmental and health gains made in Ontario with the phase-out of coal, we wish to see continued progress in urgently and drastically cutting GHG emissions to reach our targets. The GHGs generated by the use of fossil fuels including natural gas to meet our energy needs contribute to the current climate crisis which in turn is the single greatest threat to human health of our time. Thus gas-powered energy must be rapidly phased out for public health reasons in addition to the above-mentioned. Likewise the health risks of nuclear energy including both the disposition of nuclear waste as well as vulnerabilities of nuclear facilities to climate-related or deliberate man-made security threats are unacceptable, especially with the proliferation of alternative options such as solar, wind and hydro superior in regards to health risks and cost.