Feedback Form

Regional Electricity Planning in East Lake Superior – December 11, 2025

Feedback Provided by:

Name: Linda Heron

Title: Chair

Organization: Ontario Rivers Alliance

Email: [redacted]

Date: 28 January 2026

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

Following the East Lake Superior electricity planning engagement webinar held on December 11, 2025, the Independent Electricity System Operator (IESO) is seeking your feedback on the wire and non-wire options that will be considered to meet the needs. A copy of the presentation and the recording of the session can be accessed from the engagement web page.

Please submit feedback to engagement@ieso.ca by January 30, 2025**.**

Topic	Feedback
What feedback do you have on the wire and non-wire options that will be considered to meet the region's electricity needs?	The Ontario Rivers Alliance remains concerned that the wire and non-wire options are being advanced on the basis of **over-confident demand projections and deterministic language**, despite the fact that the IESO's own materials acknowledge the use of scenario-based forecasting rather than certainty.

Topic	Feedback
	The December 11, 2025 presentation repeatedly frames demand growth and infrastructure needs as if they are inevitable outcomes rather than contingent scenarios, particularly with respect to industrial load growth and electrification assumptions.[1] This framing risks driving premature and oversized transmission investments that may ultimately serve provincial "Energy Superpower" ambitions rather than demonstrable regional need. While both wire and non-wire options are identified, there is insufficient evidence that **non-wires alternatives are being treated as a serious first-order planning tool**, rather than as a secondary or screening-level consideration. Given the region already has over 1,200 MW of installed generation and no identified shortfall in generation capacity, the primary planning challenge should be transmission management and system resilience — not new supply procurement.[2] Most critically, the options analysis remains disconnected from Ontario's most authoritative climate risk evidence. The IESO relies on generalized "extreme weather methodology" references rather than the **Ontario Climate Change Impact Assessment (OCCIA)[3]**, which provides region-specific projections for drought frequency, extreme precipitation, temperature volatility, and hydrological change — all of which directly affect transmission reliability and hydroelectric performance. This omission materially undermines confidence in both wire and non-wire option selection.
What additional information should be considered in the evaluation of wire and non-wire options?	At a minimum, the evaluation of both wire and non-wire options must explicitly incorporate the **OCCIA**, rather than treating climate change as a generic adjustment factor. The Load Forecast Guideline makes clear that demand forecasting must evolve to reflect *"changing weather patterns due to climate change"* and that historical demand patterns are becoming less reliable predictors of future conditions.[4]

Topic	Feedback
	However, in practice, the East Lake Superior IRRP process appears to rely on backward-looking weather correction models rather than forward-looking climate risk projections. This is particularly problematic in a region that is: • Winter-peaking; • Heavily dependent on hydroelectric and transmission assets vulnerable to low-flow conditions, ice loading, and extreme precipitation; and • Being positioned as part of Ontario's future export-oriented electricity strategy. The IESO must distinguish **real regional reliability needs** from speculative, province-wide supply ambitions. The Scoping Assessment Outcome Report did not identify a need for new generation in the region, yet current planning language implicitly assumes ongoing growth that aligns more closely with provincial "Energy Superpower" narratives than with demonstrated local demand. Without integrating OCCIA findings, the IRRP risks locking ratepayers into long-lived transmission assets that may be underutilized, climate-vulnerable, or misaligned with actual future load. Since some project planning costs will be placed on the backs of ratepayers, it is essential that no unnecessary costs are incurred.
Are there any additional information that should be provided in future engagements to help understand community perspectives and insights?	Future engagements must move beyond high-level assurances and provide **transparent, testable justifications** for infrastructure proposals. Specifically, the IESO should: • Clearly separate *reference* versus *high* forecast scenarios in all materials, avoiding language that presents the high scenario as an expected outcome; • Explicitly identify what assumptions are driven by confirmed regional commitments versus speculative or provincial-level policy objectives; • Demonstrate how Indigenous, municipal, and stakeholder feedback is influencing option selection, not merely being "noted."

Topic	Feedback
	The 23 July 2025 feedback submitted by ORA already emphasized the need to reject over-building driven by "Energy Superpower" aspirations in favour of caution under conditions of profound uncertainty. That concern remains unaddressed in the December 2025 engagement materials. Communities need to see that planning decisions are grounded in **credible need, climate realism, and ratepayer protection**, not aspirational export strategies.

ORA General Comments/Feedback

The East Lake Superior IRRP is taking place at a time when Ontario is rapidly committing to new nuclear generation and signalling future hydropower procurement — yet regional planning documents continue to ignore the province's own climate risk assessment.

This disconnect creates a real risk that regional transmission planning becomes a mechanism to pre-enable surplus generation rather than to meet verified local needs. Given the long asset lives and irreversible impacts of transmission infrastructure, this approach is neither prudent nor defensible.

The IESO must replace language of certainty with **honest acknowledgement of uncertainty**, and ensure that infrastructure planning is resilient, evidence-based, and regionally justified — not driven by a predetermined "Energy Superpower" trajectory.

Ratepayer Exposure and Cost-Shift Risk:

The IESO's regional planning work is occurring in parallel with major, provincially directed investments in new nuclear generation and preparatory work to enable future generation development, including the planning and partnership frameworks being advanced by Ontario Power Generation (OPG) with Indigenous communities. These costs are not hypothetical. The carrying costs of new nuclear projects, early-stage planning expenditures, and system-enabling investments are already being recovered through electricity rates and will continue to be borne by ratepayers long before any electricity is delivered.

Ratepayers are already experiencing material bill increases. On November 1, 2025, electricity bills increased by approximately **30 per cent**, once global adjustment and related charges are accounted for. Whether presented as rebates, deferrals, or regulatory smoothing mechanisms, these costs do not disappear — they are shifted forward and shared across ratepayers.

Against this backdrop, advancing regional transmission planning that implicitly accommodates surplus generation or export-oriented "Energy Superpower" ambitions presents a serious affordability risk.

Transmission assets are long-lived, capital-intensive, and rate-based. Once approved, they lock ratepayers into decades of cost recovery regardless of whether projected demand materializes.

The East Lake Superior Scoping Assessment did **not identify a need for new generation**, and the region already hosts significant installed capacity. Planning decisions must therefore be anchored in **demonstrable regional reliability needs**, not in speculative future supply scenarios layered on top of nuclear expansion whose costs are already stressing household and industrial electricity bills.

In a period of compounding uncertainty — climate risk, industrial load volatility, and escalating system costs—prudence, not overbuild, is the only defensible planning posture. Failure to align regional planning with affordability realities risks eroding public trust and undermining the social licence required for any future infrastructure development.

Climate-Blind Hydropower Planning and Stranded Asset Risk:

Compounding these affordability risks is the Province's continued failure—reflected in this IRRP process, to meaningfully apply the OCCIA to future hydropower planning. New hydropower facilities contemplated today will not be in service for eight to ten years, placing their operational lifespan squarely within a climate regime characterized by increased drought frequency, reduced summer baseflows, more volatile winter hydrology, and greater seasonal flow mismatch.

Hydropower generation in Ontario is fundamentally dependent on sufficient and predictable water flows. The OCCIA makes clear that these conditions can no longer be assumed. Yet hydropower continues to be treated as a firm, dependable, and climate-resilient resource in long-term planning, despite growing evidence that summer low-flow conditions and winter variability will increasingly limit generation precisely when demand is highest.

Proceeding with new hydropower under these assumptions risks creating **stranded assets**: facilities that cannot operate as intended, cannot recover their costs through energy production, and nonetheless remain embedded in the rate base. This risk is magnified by the fact that Ontario does **not** require upfront, fully funded decommissioning provisions for hydropower. When projects underperform, are abandoned, or reach the end of their useful life, the environmental liability and financial burden are left to the public.

Ignoring OCCIA findings, therefore, does not merely weaken planning rigour; it exposes ratepayers to long-term financial risk while locking watersheds into irreversible infrastructure that may fail under the very climate conditions now projected with high confidence. This is the opposite of prudent, resilient electricity planning.

Municipal Liability and Downloaded Decommissioning Costs:

The consequences of climate-blind hydropower planning will not end with stranded assets on a balance sheet. They will be felt most acutely by **host municipalities**, which are left with the physical and ecological legacy of underperforming or abandoned hydroelectric infrastructure.

When hydropower facilities become non-viable due to insufficient flows or operational unreliability — a foreseeable outcome under the climate conditions projected in the Ontario Climate Change Impact Assessment — the Province does not require proponents to carry fully funded, upfront decommissioning obligations. As a result, responsibility for addressing public safety risks, restoring river function, and rehabilitating degraded stream systems frequently falls to municipalities and conservation authorities.

Dam removal and river restoration are complex, multi-year undertakings that impose substantial financial, technical, and administrative burdens on local governments. These costs are borne long after the project's private benefits have been realized, and often without a corresponding revenue source. In effect, municipalities are left to subsidize the cleanup of infrastructure that provincial planning frameworks allowed to proceed without climate realism or lifecycle accountability.

This represents a clear case of **cost downloading**: provincial energy planning decisions create future liabilities that municipalities neither approved nor are equipped to fund. In an era of increasing fiscal pressure on local governments, this outcome is neither responsible nor defensible.

If regional electricity planning fails to integrate OCCIA findings and lifecycle accountability into decision-making today, it is municipalities — and the rivers they depend on — that will ultimately pay the price.

Expanded Conservation Authority Governance Risk:

These municipal and watershed-scale risks are further amplified by the Province's current consideration of restructuring Ontario's 36 Conservation Authorities into as few as seven large regional entities, with a revised mandate increasingly oriented toward permitting and enabling development projects, when this is work traditionally assigned to the Ministry of Natural Resources and Forestry.

Such a restructuring would weaken local watershed expertise, dilute accountability to affected municipalities, and erode the independent oversight role that Conservation Authorities have historically played in flood risk management, dam safety, sediment control, and ecological protection. At the same time, it would position reconfigured Conservation Authorities to facilitate the approval of large-scale energy and infrastructure projects — including hydropower — without a corresponding increase in authority, funding, or responsibility for long-term decommissioning and restoration outcomes.

The result is a compounding governance failure: provincial energy planning decisions create climate-vulnerable and potentially stranded infrastructure; Conservation Authorities are restructured to enable those projects; and municipalities and watershed agencies are then left to manage the long-term environmental, public safety, and financial consequences. This model externalizes risk downward while centralizing decision-making upward, undermining both local democracy and watershed-based planning.

In this context, the absence of mandatory, upfront decommissioning provisions for hydropower infrastructure is not a technical oversight — it is a foreseeable transfer of long-term liability onto municipalities and reconfigured Conservation Authorities that neither approved the projects nor possess the fiscal capacity to remediate them.

Regional transmission planning decisions are not neutral or easily reversible. Once transmission capacity is approved and constructed, it effectively predetermines future generation pathways, regardless of whether underlying demand forecasts or climate assumptions ultimately prove inaccurate. For this reason, climate risk, affordability, and lifecycle accountability must be embedded at the front end of IRRP decision-making, not deferred to later stages when meaningful alternatives have already been foreclosed.

Linda Heron, Chair
Ontario Rivers Alliance

---

[1] *2025-12-11-East Lake Superior Regional Electricity Planning, Engagement Webinar: Electricity Needs and Options Identification.*
[2] *2025-01-09-East Lake Superior Scoping Assessment.*
[3] *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*
[4] *Load Forecast Guideline for Ontario, Guidance for the Development of Regional Planning Demand Forecasts, Regional Planning Process Advisory Group, October 13, 2022.*