Feedback Form

Regional Electricity Planning in East Lake Superior – June 4, 2026

Feedback Provided by:

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Date: 25 June 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 June 4, 2026, the Independent Electricity System Operator (IESO) is seeking your feedback on the detailed options analysis and draft recommendations 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 June 25, 2026**.**

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What feedback do you have on the draft recommendations?	The Ontario Rivers Alliance (ORA) is a not-for-profit grassroots organization with a mission to protect, conserve, and restore Ontario rivers. ORA advocates for effective policy and legislation to ensure that development affecting Ontario rivers is environmentally and socially sustainable. **ORA supports the right-sized, non-wires elements of this plan.** We commend the Technical Working Group for

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	three sound calls. The Chapleau need is met with a low-cost capacitor and demand-side management rather than new supply. The Algoma 115 kV need is met with a $5 million enhancement to the existing Remedial Action Scheme rather than a $10 to $30 million circuit rebuild. And no new regional transmission line is required, while the previously reported Chapleau station-capacity need has disappeared entirely. These outcomes reflect the caution ORA has urged since July 2025, and they show that careful planning can meet real needs without overbuilding. **ORA's central concern is the draft recommendation for the Sault Ste. Marie 115 kV area.**[1] The recommended dispatchable generation is specified as a resource that must not be energy limited and must be always available, and the analysis screens out wind paired with battery storage as not feasible. In practice, only a new fossil-gas generating station can meet those criteria. A decision of this magnitude is being made through a technical screening, and ORA opposes it on two grounds: it exposes ratepayers to avoidable long-term cost, and it contradicts the IESO's own published analysis. **First, this is a ratepayer issue. The cost comparison behind the recommendation is not sound.** The presentation shows dispatchable (gas) generation at a net cost of $0M, because its full capital cost is netted against assumed province-wide system benefits, while wind paired with battery storage is shown at a gross cost of up to $194 million with no comparable netting. Comparing one option net of benefits against another gross of benefits is not a like-for-like comparison, and it makes the fossil option look free when it is not. A new gas plant locks ratepayers into decades of fuel-price and carbon-cost exposure that a wind-and-storage resource does not carry. **Second, the recommendation contradicts the IESO's own Hybrid Resource Equivalency Assessment (August 2025).**[2] That technical paper found that wind, solar, and battery storage can provide reliable, dispatchable capacity comparable to conventional generation. The Sault Ste. Marie screening applies the very energy-limited assumption that the IESO's own paper set out to test, and rejected. The IESO cannot rely on the Hybrid Assessment in its provincial planning and disregard it in this region.

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	ORA Recommendation 1: Do not adopt operational criteria (non-energy-limited, always-available fuel) that exclude every non-emitting option and effectively predetermine a new fossil-gas plant for the Sault Ste. Marie area. **ORA Recommendation 2:** Keep the Sault Ste. Marie procurement genuinely technology-neutral, and evaluate wind, solar, storage, and hybrid resources on the firm-capacity basis established by the IESO's own Hybrid Resource Equivalency Assessment. **ORA Recommendation 3:** Maximize electricity demand-side management and energy storage to defer and reduce the Sault Ste. Marie need before committing to any new generation, drawing on the expanded Save on Energy budget.
What information needs to be considered regarding the draft recommendations?	**Honest, like-for-like cost disclosure.** The plan should publish the gross capital cost and the net cost, calculated on the same basis, for every option in each area. Communities and ratepayers cannot evaluate a recommendation built on a $0M figure that is not comparable to the alternatives it is measured against. **The Hybrid Resource Equivalency Assessment must be applied here.** The screening of wind paired with battery storage should be redone consistently with the IESO's August 2025 findings, and the IESO should disclose the full analysis behind its conclusion that wind-plus-battery is not feasible in Sault Ste. Marie. **The IBR limit is being presented as permanent when the IESO says it is solvable.** Both the Chapleau and Sault Ste. Marie screenings reject renewable options on inverter-based-resource and deliverability limits, yet IESO staff stated at the June 4 webinar that the IESO will look to remedies to resolve those deliverability constraints. Excluding the cleaner, lower-risk options today, on a constraint the IESO is actively working to remove, is premature. The plan should disclose the timeline for those remedies and re-test non-emitting options against it before any procurement. **Scenario disaggregation and stranded-asset exposure.** The Algoma 115 kV supply-capacity need is zero

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	under the reference forecast and arises only under the high-growth scenario. The plan should tag every identified need and draft recommendation to the scenario driving it, and quantify ratepayer exposure if demand tracks the reference case rather than the high case. **Ontario's own climate science.** ORA has twice asked the IESO to apply the Ontario Provincial Climate Change Impact Assessment (OCCIA, 2023).[3] The OCCIA projects far more than rising temperatures. It projects more frequent and more prolonged drought, alongside more intense extreme rainfall and flooding, and it identifies electrical power generation infrastructure as the highest-risk category across all future time periods. Both directions of that risk bear directly on the recommendations in this plan. Drought reduces the output of water-dependent generation and strains the cooling and operating margins of thermal plants, precisely when summer demand peaks. Extreme rainfall and flooding threaten the physical reliability of the generation and transmission assets this plan would lock in for decades. A backward-looking extreme-weather correction captures neither trend. The demand forecast, and any new generation in the Sault Ste. Marie area, should be stress-tested against the OCCIA's drought and extreme-precipitation projections, not against temperature alone. **ORA Recommendation 4:** Publish gross and net costs for every option on a consistent, like-for-like basis. **ORA Recommendation 5:** Re-screen wind, solar, storage, and hybrids consistently with the Hybrid Resource Equivalency Assessment, and disclose the timeline for resolving the IBR and deliverability limits before excluding any non-emitting option. **ORA Recommendation 6:** Tag each identified need and recommendation to the reference or high-growth scenario, and quantify ratepayer stranded-asset exposure under the reference case. **ORA Recommendation 7:** Stress-test the demand forecast and any new generation against the Ontario Provincial Climate Change Impact Assessment, including its

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	drought, extreme-precipitation, and flooding projections, not against temperature alone.
How can the IESO continue to engage with communities and stakeholders as the recommendations are implemented, or to help prepare for the next planning cycle?	**Publish the underlying options-analysis data, not just headline conclusions.** Communities can give meaningful feedback only if they can see the cost assumptions, the system-benefit calculations, and the screening analysis behind each recommendation. **Hold a further engagement before any Sault Ste. Marie generation is procured.** Because the draft recommendation effectively selects a resource type, the procurement design, including how technology neutrality will be honoured and how storage and hybrids will be evaluated, should itself be brought back to communities and stakeholders before it is finalized. **Show how feedback changed the plan.** ORA and M'Chigeeng First Nation have asked across multiple rounds that feedback influence option selection rather than simply be noted. The final IRRP should state plainly which recommendations changed in response to feedback, and why. **Coordinate disclosure across related processes.** The Sault Ste. Marie generation question overlaps the Sudbury/ Algoma IRRP and the Long Lead-Time procurement file. The IESO should present the cumulative ratepayer impact of these related decisions, not each one in isolation. **ORA Recommendation 8:** Publish the options-analysis data and assumptions and hold a further public engagement on procurement design before any Sault Ste. Marie generation is procured.

General Comments/Feedback:

This plan is being finalized as Ontario electricity bills rise sharply, and the province commits ratepayers to large new generation costs. Against that backdrop, meeting a regional reliability need with a new fossil-gas plant, chosen through a technical screening and presented as free, is exactly the kind of decision that should be made in the open.

ORA does not oppose meeting the region's genuine load growth. The largest confirmed driver, the Algoma Steel Electric Arc Furnace, is a major electrification project that ORA supports. The question is not whether to serve that load but how: with transparent costs, genuine technology neutrality, and resources consistent with Ontario's climate science, or with an opaque, locked-in fossil commitment.

A new gas plant would emit for the full length of its contract, at a time when Ontario's own climate assessment ranks electricity infrastructure as its highest-risk category. ORA asks the IESO to place on the formal planning record that meeting this need with a fossil resource is inconsistent with Ontario's climate science, and to convey that conflict, together with the ratepayer-cost and Hybrid Assessment concerns above, to the Minister.

The Sault Ste. Marie recommendation should also be read against how the renewable alternative is being described publicly. On June 23, 2026, the Minister of Energy and Mines dismissed a renewables-and-storage option as more costly because, in his words, the public would have to buy land akin to the size of Toronto.[4] That is not how procurement works. The IESO does not buy land for wind, solar, or storage. It contracts with private proponents and pays a negotiated price per unit of power, while the proponent secures the land, almost always by lease. The same account ignored storage entirely, and criticized a cost study that is, in fact, the IESO's own August 2025 Hybrid Resource Equivalency Assessment, which found that wind, solar, and BESS can provide reliable, dispatchable capacity competitive with gas and nuclear.

ORA places on this record that the Sault Ste. Marie options analysis, and any resulting procurement, must rest on the IESO's own technical evidence and a genuinely technology-neutral, storage-inclusive comparison, not on public claims that misstate how renewables are procured. ORA further notes that the IESO's technical analysis has been overridden by Ministerial directive, including the 16 April 2026 Long-Lead-Time directive issued despite the Hybrid Assessment.[5] That is precisely why the cost basis and technology-neutrality of this regional decision must be documented openly and placed on the public record.

The Minister also faulted the renewables study for omitting transmission costs. That inverts the comparison. Central nuclear and large hydropower are the transmission-heavy options, requiring new bulk lines to carry power across the province; the new line to bring Darlington's nuclear output to Toronto is budgeted at $1.5 billion.[6]

This regional plan shows the alternative. Local needs can be met without new bulk transmission, and the IESO's own rationale for local supply at Sault Ste. Marie, that it reduces reliance on the transmission interface, applies equally to local wind, solar, and battery storage. Resources sited near the load need only local connections, not province-spanning corridors, and can be built faster than central nuclear or major transmission lines. Some transmission will always be needed, but it is a small fraction of what is being proposed, and it is a cumulative ratepayer commitment that the public is never shown in total. Remote communities, in particular, are where local wind, solar, and battery storage should be considered first, rather than waiting for long transmission builds.

Regional transmission and generation decisions are long-lived and effectively irreversible once made. The IESO has shown in this very plan, at Chapleau and Algoma, that real needs can be met with low-cost, right-sized solutions. The Sault Ste. Marie recommendation should be held to the same standard: prove the cost honestly, keep the competition open, and do not lock ratepayers into a fossil-gas plant that the IESO's own analysis shows is unnecessary.

Respectfully submitted,

Linda Heron, Chair
Ontario Rivers Alliance

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Endnotes:

1. *IESO. East Lake Superior Regional Electricity Planning, Engagement Webinar: Options Analysis and Draft Recommendations. June 4, 2026.*
2. *IESO. Hybrid Resource Equivalency Assessment. August 2025. https://ieso.ca/-/media/Files/IESO/Document-Library/Technical-papers/Hybrid-Resource-Equivalency-Assessment.pdf*
3. *Ontario Ministry of the Environment, Conservation and Parks. Ontario Provincial Climate Change Impact Assessment, Technical Report. 2023. https://www.ontario.ca/files/2023-11/mecp-ontario-provincial-climate-change-impact-assessment-en-2023-11-21.pdf*
4. *Canadian Broadcasting Corporation. Power and Politics, interview with Stephen Lecce, Minister of Energy and Mines. June 23, 2026. https://gem.cbc.ca/power-politics/s01e10698731*
5. *Minister of Energy and Mines (Ontario). Directive to the IESO regarding the 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*
6. *Government of Ontario.* Ontario Focused on Economy by Approving New Toronto Transmission Line*. News release, 2026. https://news.ontario.ca/en/release/1006901/ontario_focused_on_economy_by_approving_new_toronto_transmission_line*