

Feedback Form

Regional Electricity Planning in the GTA East Region – April 20, 2026

Feedback Provided by:

Name: Brigid Rowan

Title: Senior Economist, Econalysis Consulting Services

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

Email: [REDACTED]

Date: May 5, 2026

To promote transparency, feedback submitted will be posted on the GTA East [engagement webpage](#) unless otherwise requested by the sender.

Following the GTA East regional planning webinar held on April 20, 2026, the Independent Electricity System Operator (IESO) is seeking feedback on the identified electricity needs and initial screening of potential options. A copy of the presentation as well as recording of the session can be accessed from the [engagement web page](#).

Please submit feedback to engagement@ieso.ca by May 11, 2026.

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?	See General Comments/Feedback

Topic	Feedback
What additional information should be considered in the evaluation of wire and non-wire options?	See General Comments/Feedback
Are there other types of information that would be helpful for us to provide in future engagements to enhance understanding of community perspectives and insights?	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 the IESO Planning Processes (including Regional Electricity Planning in the GTA East Region and the GTA West Region, as well as related Bulk Planning for South and Central Ontario) 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 Presentation¹ explains that Regional Electricity Planning in the GTA East Region is based on Bulk Planning for South and Central Ontario. The feedback previously provided by the PWU on this Bulk Planning is also highly relevant for Regional Electricity Planning in GTA East Region, and 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 Bulk Planning, since this feedback is especially relevant to (and reinforced by) GTA East Regional Planning.

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.

In Ontario’s current high demand growth environment, the costs/risks of underbuilding electricity infrastructure are much higher than the costs/risks of right-sizing (or upsizing) infrastructure.

¹ GTA East Regional Electricity Planning, Engagement Webinar: Electricity Needs and Options Screening, April 20, 2026, especially pp. 8, 40-43. <https://www.ieso.ca/-/media/Files/IESO/Document-Library/regional-planning/GTA-East/GTA-East-20260420-presentation.pdf>

² Bulk Planning Update Webinar (South and Central 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/scbp-20251212-feedback-form-Power-Workers-Union.pdf>

Planning should therefore prioritize sufficient and timely capacity to accommodate high-growth scenarios, rather than optimizing narrowly around central forecasts.

Pages 13-15 of the Presentation explain the GTA IRRP Demand Forecast and provide a graphic of the Final GTA East Demand Forecast. This forecast is a central input and driver for the entire GTA East Regional Planning process.

The GTA East Forecast incorporates three scenarios:

- Reference, based on today's trends and policies
- High
- Low.³

Planning recommendations will primarily be based on the reference forecast. The high and low growth scenarios are intended to support flexible, resilient planning, and these scenarios will be used to inform the potential timing of options.

The PWU is very supportive that Regional Electricity Planning in the GTA East Region has now begun to incorporate consideration of a High Growth Scenario. This positive evolution in electricity planning for the GTA East Region is long overdue and further highlights the PWU's ongoing concerns that IESO Planning Processes continue to be largely (and often solely) based on a Reference Scenario. It is especially notable (and problematic) that Regional Electricity Planning for other areas of the province (such as GTA West) are still based solely on a Reference Scenario, rather than also incorporating a High Growth Scenario.⁴

As extensively documented in the Presentation (especially pp. 14-27, 31), the Final GTA East Demand Forecast vividly demonstrates that the scale and urgency of infrastructure growth required in GTA East is particularly intense (greater than provincial averages):

- electricity demand is growing very rapidly due to a strong convergence of multiple growth factors, including:
 - population and economic growth
 - residential, commercial, industrial and other development
 - electrification (of both buildings and vehicles)
- electricity demand will grow rapidly
 - throughout the forecast period out to 2044, with even faster growth after 2034
 - throughout the year, but especially in winter
 - regional demand that is now mildly summer peaking will shift to being similar in winter

³ The graphic of Final GTA East Demand Forecast (on page 14 of the Presentation) includes forecasts for Summer Reference, High and Low, for both Summer and Winter.

⁴ Regional Electricity Planning in the GTA West Region – April 2, 2026, Feedback of the Power Workers' Union, April 23, 2026, p. 3. <https://www.ieso.ca/-/media/Files/IESO/Document-Library/regional-planning/GTA-West/gta-west-20260402-feedback-form-PWU.pdf>

- electricity demand is forecasted to grow faster in GTA East than in other areas of the province, and actual growth could be much higher than now forecasted
 - in the GTA East Reference Scenario, demand grows by 104% in summer and 129% in winter by 2044 (Presentation, p. 14), as compared with forecasted growth of 89% in GTA West and 65% provincially⁵
 - in the GTA East High Growth Scenario, demand grows by 146% in summer and 170% in winter by 2044
 - IESO load forecasts and system planning continue to have little if any consideration of potential large-scale customers, such as data centres; the exclusion of these less certain – but increasingly likely – large loads (particularly transmission-connected loads) risks systematically understating future demand requirements.⁶
- additional capacity is required throughout the GTA East transmission and distribution systems
 - at locations throughout the region
 - throughout the planning period out to 2044, including
 - near-term (next five years)
 - medium-term (following five years)
 - long-term (last ten years).
- the needs for expanded electricity infrastructure are immediate and urgent
 - existing infrastructure will have constraints in the near- to medium-term
 - large-scale, long-term upgrades such as new transmission lines and transformer stations are required and essential, but take time (7-10 years) to plan, design, and construct
 - short-term and medium-term measures (including non-wires solutions) are being explored to help maintain reliability and support growth until infrastructure can be more fully upgraded; but they cannot substitute for core transmission and distribution infrastructure expansion.

Based on all of the above, it is very clear that:

- Electricity infrastructure serving the GTA East region must be expanded rapidly and at scale to meet accelerating demand.
- This region (and all of Ontario) is already in a catch-up position, reflecting earlier planning that systematically underestimated rapidly growing electricity demand.

⁵ GTA West Regional Electricity Planning, Engagement Webinar #2: Needs and Initial Options Screening, April 2, 2026, p. 12. <https://www.ieso.ca/-/media/Files/IESO/Document-Library/regional-planning/GTA-West/gta-west-20260402-presentation.pdf>

⁶ See extensive discussion in the April 20 Webinar (especially 50:00 to 102:00), and Regional Electricity Planning in the GTA West Region – April 2, 2026, Feedback of the Power Workers’ Union, April 23, 2026, p. 3. <https://www.ieso.ca/-/media/Files/IESO/Document-Library/regional-planning/GTA-West/gta-west-20260402-feedback-form-PWU.pdf>

- IESO planning continues to be mainly based on demand forecasts that do not adequately consider High Growth Scenarios.⁷

⁷ As explained in the Presentation (pp. 14-15), GTA East planning recommendations will primarily be based on the reference forecast. Moreover, actual demand growth could be substantially higher than even the High Growth scenario now being used for GTA East planning.