Feedback Form

Regional Electricity Planning in the GTA West Region – April 2, 2026

Feedback Provided by:

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To promote transparency, feedback submitted will be posted on the GTA West engagement webpage unless otherwise requested by the sender.

Following the GTA West regional planning webinar held on April 2, 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 April 23, 2026.

Topic	Feedback
What feedback do you have on the wire and non-wire options that will be	See General Comments/Feedback

Topic	Feedback
considered to meet the region's electricity needs?	
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 IESO Planning Processes (including both Regional Electricity Planning in the GTA West Region and 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 Presentation[1] explains that Regional Electricity Planning in the GTA West Region is based on Bulk Planning for South and Central Ontario. The feedback previously provided by PWU on this Bulk Planning is also highly relevant for Regional Electricity Planning in GTA West 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 West 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.

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[1] GTA West Regional Electricity Planning, Engagement Webinar #2: Needs and Initial Options Screening, April 2, 2026, especially pp. 7-8, 33-36. https://www.ieso.ca/-/media/Files/IESO/Document-Library/regional-planning/GTA-West/gta-west-20260402-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

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

Page 12 of the Presentation explains the GTA IRRP Demand Forecasts and provides a graphic of the GTA West Forecast Overview. This forecast is a central input and driver for the entire GTA West Regional Planning process.

However, the GTA West Forecast appears to be based solely on a Reference Scenario, rather than also incorporating a High Growth Scenario.[3] Moreover, the GTA West Forecast relied upon for Regional Planning does not include potential transmission-connected large-scale customers, such as data centres.[4]

This is a material limitation. While some advanced data centre demand is embedded in the forecast, the exclusion of less certain – but increasingly likely – large loads (particularly transmission-connected loads) risks systematically understating future demand requirements.

Nonetheless, as extensively documented in the Presentation (especially pp. 12-32), even the GTA West Forecast (based on a Reference Scenario) vividly demonstrates that the scale and urgency of infrastructure growth required in GTA West are massive and particularly intense (even 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 both intensifying within traditional demand centres, and spreading outward (north and west) into areas with less (and often little) existing demand and infrastructure
    - electrification (of both buildings and vehicles, including public transit)
- this rapid growth in electricity demand significantly exceeds:
    - actual historical demand growth
    - previous forecasts (that were relied upon in previous planning and basis for determining infrastructure requirements)
- electricity demand will grow rapidly throughout the year, but especially in winter

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[3] The graphic of GTA West Forecast Overview (on page 12 of the Presentation) includes forecasts for Summer Reference and Winter Reference, but does not include any information for a High Growth Scenario.

[4] As explained in the notes to the graphic of GTA West Forecast Overview (on page 12 of the Presentation): "* . . . This forecast does not include potential transmission-connected large-scale customers." As further explained in the April 2, 2026 Webinar (especially 51:30 to 55:15), a limited amount of demand from data centres is embedded into the GTA West Forecast, notably for data centres that are far advanced and thus certain/very likely to be completed. But the GTA West Forecast does not include potential demand from data centres that are not as far advanced. In particular, the GTA West forecast does not include potential large loads that would be transmission-connected (rather than supplied through the distribution system).

    - regional demand that is now strongly summer peaking will shift to being winter peaking starting around 2034
- additional capacity is required **throughout** the GTA West 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
    - current infrastructure cannot keep pace, especially in areas that have little or no existing infrastructure
    - large-scale, long-term upgrades such as new transmission lines and transformer stations are required and essential, but take time 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 during the transition 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 West 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
- IESO planning continues to be based on demand forecasts that do not adequately consider High Growth Scenarios.

In summary, GTA West Regional Planning confirms that the concerns previously and repeatedly raised by the PWU regarding IESO Planning Processes have not yet been fully and properly addressed. IESO planning processes are not yet consistently grounded in sufficiently robust high-growth demand scenarios, and therefore risk under-delivering the infrastructure required to ensure reliability under plausible future conditions.