Feedback Form

Local Achievable Potential Study Webinar – August 21, 2025

Feedback Provided by:

Name: Lynn Blaxley and Corey Helm

Title: TERRE Member

Organization: Toronto East Residents for Renewable Energy

Email: [redacted]

Date: September 18, 2025

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

Following the Toronto Local Achievable Potential Study (L-APS) webinar held on August 21, 2025, the Independent Electricity System Operator (IESO) is seeking feedback on the draft findings. A copy of the presentations as well as a recording of the session can be accessed from the engagement web page.

Please submit feedback to **engagement@ieso.ca** by September 18, 2025.

Topic	Feedback
What feedback do you have on the L-APS draft findings?	The size of the gap between the technical and the economic potential and what IESO considers "achievable" is huge, reflecting a very conservative approach. TERRE was disappointed that there was not more of an effort to identify additional energy savings and electricity generation from within the boundaries of Toronto and off-shore on Lake Ontario. The findings need to go further and identify initiatives that could help narrow the identified gap between the technical, economic, and achievable potential of electricity demand side management in Toronto.
Is there additional information that should be considered before L-APS findings are finalized?	This report represents a huge missed opportunity for further costs savings and numerous co-benefits (health, climate, jobs, etc.) by not considering a more aggressive approach to electricity generation, storage, demand response, and energy efficiency within the city.
Are there specific modelling methodology or assumption topics that you would like to see discussed in the final public report?	Yes, assumption topics we are interested in are: (a) what sources of energy savings were considered and how they were quantified; and, (b) what sources of energy generation were considered and how they were quantified. We would also like to know what mechanisms were used to validate the results. See General Comments/Feedback below for further concerns regarding approaches and assumptions.
How can the IESO best communicate with communities and stakeholders on actioning the additional electricity demand-side management opportunities identified in the study?	Toronto Hydro has a website as well as monthly billings which would serve as the easiest way to cover the city.

General Comments/Feedback

Our thanks to the IESO for the L-AP study webinar, follow-up information and for the opportunity to respond. While the modelling is sophisticated and detailed data is provided, the study appears to be based on underlying assumptions and approaches that are of significant concern to TERRE. The study is very conservative in its approach, staying within the limits of the province's energy status

quo. Despite reaching out to a horizon of 2045, the study does not appear to consider the potential impact of global trends where so many jurisdictions are moving away from the use of fossil fuels and nuclear energy and towards much less expensive and more resilient local renewable options. The conclusions of the study also appear to be constrained by the relative favour given to wire solutions (i.e. a third transmission line) by the IESO and the provincial government. Scenarios of a reference ("business as usual") electricity use case and a high electrification case (e.g., elevated growth rate of data centres) are provided. Using a similar approach, scenarios of a reference case and case of high uptake of measures such as energy efficiency and local renewable energy would have been informative. In addition, this would have provided valuable information about the changes needed to increase local potential. We find ourselves wondering if local potential studies from comparison cities were searched out and taken into consideration, especially cities that have successfully implemented local renewable options and energy conservation measures. It is disconcerting that the study dismisses the potential of battery energy from electric vehicles as "not meaningful for planning purposes" due to its relatively new stage of development. Ironically, the L-AP study and the Toronto IRRP is dependent on a regional plan that appears to place reliance on small modular nuclear reactors (SMRs) that are largely experimental and unproven at scale. The study appears to significantly underestimate the potential for growth in local solar energy given what is happening in other jurisdictions, including solar fences (Germany), parking lot solar (France), train track solar (Switzerland) and balcony solar (Utah). Solar energy is growing in Nordic countries in latitudes north of us. Estimates by Ontario Clean Air Alliance of the potential for parking lot solar alone (2.5 times the power currently coming from the Portlands gas plant) suggests the possibility of significant future growth. The analysis gives no consideration to external costs for City finances and individual Torontonians in the form of health care costs, infrastructure damage, insurance increases and other burdens due to local pollution and climate change impacts associated with extended dependence on fossil fuel at the Portlands Energy Centre (during the wait time for a 3rd transmission line) and failure

to more aggressively pursue local renewable alternatives. While perhaps outside the scope of the study's analysis, given the seriousness of the issue, this cost of continuing with status quo options should at least be acknowledged. The L-AP webinar described collaboration as a key pillar and stated a commitment to continue working with Toronto Hydro and the City of Toronto. A City of Toronto motion in June 2024 requested alignment of the IESO IRRP with the City's 2040 target of net zero greenhouse gas emissions by, amongst other things, "rapidly increasing local renewable energy generation and storage, and maximizing cost-effective energy efficiency". The approach taken in this study is not consistent with the City of Toronto's request, nor the City's TransformTO climate plan. Given the rapidly dropping cost of renewable energy, we wonder what an Auditor-General value for money audit would reveal. Our concluding thought and hope is that the findings of this study will become first steps in a more comprehensive approach which will consider how to narrow the gaps between "achievable", "economic" and "technical" potential.