

Feedback Form

Regional Electricity Planning in Toronto – September 25, 2025

Feedback Provided by:

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Date: October 8, 2025

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

Following the Toronto Region electricity planning engagement webinar held on September 25, 2025, the Independent Electricity System Operator (IESO) is seeking feedback on the options analysis and draft recommendations. A copy of the presentation as well as a recording of the session can be accessed from the [engagement web page](#).

Please submit feedback to engagement@ieso.ca by October 9, 2025.

Topic	Feedback
What feedback is there on the options analysis?	Not sufficient transparency to make adequate feedback
What feedback is there on the draft recommendations?	Not sufficient transparency to make adequate feedback
What information needs to be considered regarding these draft recommendations?	Not sufficient transparency to make adequate feedback
What should be considered regarding the third supply line before the regional plan is released?	Click or tap here to enter text.
How can the IESO continue to engage with communities and stakeholders as these recommendations are implemented, or to help prepare for the next planning cycle?	Commitment to transparent consultations

General Comments/Feedback

We commend the IESO for recognizing that the significant stakeholder feedback needed to be addressed, and that its approach should align with the City of Toronto's TransformTO initiative, which includes a focus on eDSM and DERs and greater electrification across the city.

However, the comments provided by Pollution Probe in its feedback form submitted September 19, 2025 remain valid and we ask that you continue to consider those comments and the comments of other stakeholders. The IRRP process needs to be responsive to feedback and to comments and concerns by stakeholders. The September 25th presentation did not have any updated information on the modelling done by ICF, apart from providing more background information, but not yet explaining how the results were achieved. The Potential Study is still a "black box" with inadequate explanations and as such practically invalidates the entire engagement process. The Potential Study may be accurate and reflect best available inputs, but that is not something that can be determined. Having such a black box study signifies that the engagement process is unimportant as the data that will be considered was done before engagement begins, and is not updated or refined based on feedback. Providing modelling results with little input, complete lack of transparency, and then not providing information, is not engagement.

The significant reductions from economic to achievable based on ICF modelling assumptions and is compounded by the exclusion of some DERs (e.g. V2X), results in a reduction of DER potential by 80-90%. Given the late stage of the process for this study, a transparent review prior to publishing the results may be difficult for IESO.

It is important to note that this is a fast-changing sector, a fact that has been identified by the IESO and is a component of many other consultations being conducted by the IESO and others. Significant effort is being applied to remove barriers and enhance use of DERs in Ontario. This can be seen in the direction given in the Energy for Generations: Ontario's Integrated Plan to Power the Strongest Economy in the G7. Following on from this direction, and sometimes starting before, are a number of consultations and working groups, in many cases led by the IESO, looking to increase the use of DERs in Ontario. Thus, the model results do not even reflect current policy, never mind where things could go in the future. Scenario analysis that includes what the province and the agencies are actually doing to reduce the barriers to DERs need to be considered or the results will be obsolete even before the plan is completed. It is also important to include a section up front to identify the scope and modeling restrictions applied so that stakeholders do not interpret the results as a barrier to achieving provincial policy goals, or as even an actual reflection on where policy is going.

Pollution Probe recognizes the difficulty in considering V2X and other new technologies in modelling results, and that V2X is unlikely to be a contributor in the short-term. However, assuming it will not be a contributor in the long-term and in the years the modelling represents is short sighted. Companies are trialling V2X in Toronto (such as Peak Power), and again the consultations led by OEB and IESO on DERs will lead to potential changes in the development of V2X. Pollution Probe is a leading enabler of EVs (including electric buses) in Canada and sees significant advancements in V2G over the next 40 years. Pollution Probe has also worked on the development of Local Flexibility Markets (potentially facilitated by a DSO model), another development that will radically change electricity in Toronto, and are not considered. It is understandable that they are not at the stage to be modelled; but ignoring them and not including sensitivity analysis make the results likely even more inaccurate and less useful when considering the future. And these are not hypotheticals – Octopus Energy in the UK is using EV charging as a flexible load now, and has contracted 1.3 GW of flexible supply across its entire portfolio – so it cannot be said that it will not come into being during the study's timeframe.

A plan will only be as good as the information going into the planning process. Given the modelling difficulties in this planning process, the results should only be considered as a draft when completed and not as a full IRRP. A proper engagement framework needs to be developed for the IRRP that allows for stakeholders to have faith in the results.