

Feedback Form

Regional Electricity Planning in Toronto – September 25, 2025

Feedback Provided by:

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- Date: October 20, 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?	TRCA staff understand that development is required to meet the electricity demand that is forecasted for this IESO study. Staff provided a letter on August 22nd on the options being reviewed. Please see below for our outlined feedback on the electricity options that require development.
What feedback is there on the draft recommendations?	Please see below for our outlined feedback on the electricity options that require development.
What information needs to be considered regarding these draft recommendations?	Please see below for our outlined feedback on the electricity options that require development.
What should be considered regarding the third supply line before the regional plan is released?	Please see below for our outlined feedback on the electricity options that require development.
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?	Further to our August 22, 2025 letter, TRCA is a recognized commenting agency through the Environmental Assessment (EA) Act and would ask that the proponent(s) of the draft recommendations engage TRCA staff early in the EA process to ensure that our detailed comments are considered and incorporated into the projects. As previously mentioned, recommendations proposed may intersect with TRCA regulated areas and will require permits under the current regulatory framework of the Conservation Authorities Act and Ontario Regulation 41/24. Additionally, IESO and future project implementation proponents should consider TRCA's Voluntary Project Review (VPR) service level agreement, where applicable, to ensure TRCA's capacities are fully leveraged in support of this project. Staff will provide more information as the recommendations develop and planning proceeds.

General Comments/Feedback

As noted in our August 22, 2025 letter (attached), TRCA staff have comments on new infrastructure that was being contemplated. We understand that in the September 25, 2025 webinar, this was scoped down and the following draft recommendations (noted on slide 64) have been made. These recommendations will require development in TRCA's regulated areas and areas of interest.

- Third Line in Toronto – Submarine Route from Bowmanville SS to Hearn TS
- Downsview TS new station

- Scarboro TS and Basin TS expansions
- Line upgrades between Manby and Riverside JCT
- Line upgrades between Leaside TS and Bloor JCT
- Line upgrades between Hearn SS to Basin TS
- Battery Energy Storage Systems (BESS) between Manby TS and John TS – potential development

We offer the following additional comments to our August 22, 2025 letter on these draft recommendations. TRCA staff will provide additional review and feedback when the regional plan is released for review.

Third Line in Toronto – Submarine Route from Bowmanville SS to Hearn TS

- IESO has selected the HVDC submarine option for the third line in Toronto and has identified that the next steps in the planning process will be dictated by the province. TRCA staff expect that IESO or the selected proponent involve staff early in the planning/EA process for this work.
- Please refer to our comments in our previous letter on the submarine option. We expect that TRCA's projects and programs are avoided by the alignment and that this project is brought to Aquatic Habitat Toronto (AHT) for further discussion with respective agencies. We also expect the projects and programs ongoing by other proponents in or near Lake Ontario are considered in planning and implementation of the submarine option.
- Additionally, staff have been provided additional information on this component including potential installation methodology (cable laying, HDD, etc.) and potential facilities required for the HVDC converter location (near Hearn TS). The new facilities and transmission line alignment proposed will need to avoid the regulatory floodplain, existing wetlands and forested areas, and TRCA property. All work along the shoreline will need to be designed to address requirements associated with the Lake Ontario shoreline hazard.
- Some sections of the submarine route are located within the Toronto Waterfront Screening Area, an area that TRCA does not issue permits, but offers Voluntary Project Review (VPR). However, other sections are in a TRCA regulated area and require permits from TRCA. Further permitting requirements will be discussed in future stages of this project, when more detailed alignment and facility options are being discussed.

Station Expansions – Downsview, Scarboro, Basin

- The footprint of the new Downsview TS station location should be identified early in the process so TRCA can identify whether the new station falls within TRCA regulated area and can ensure that any station is setback appropriately from the valley systems in the area and their associated natural hazards.
- Scarboro TS is currently adjacent to a TRCA regulated area. It appears that there may be unmapped wetlands on site, or near the site, which would need further investigation. We expect that Scarboro TS station expansions avoid TRCA regulated areas and features if possible. Staff will need to ensure that any expansion is setback appropriately from the adjacent wetlands, valley/stream systems and their associated natural hazards.

- Basin TS is currently located in a TRCA regulated area. Additional discussion will be required as the site is currently located in the regulatory floodplain. However, as part of the Port Lands Flood Protection and Enabling Infrastructure (PLFPEI) project, the floodplain is proposed to change in the area. Staff would request that any station expansions remain outside of the regulatory floodplain.

Transmission Line Upgrades – Leaside TS to Bloor JCT, Manby TS to Riverside JCT

- Line upgrades between Leaside and Bloor were newly identified in this webinar. It is our understanding that existing transmissions towers and lines will be refurbished or replaced to achieve the required electricity capacity. The scope and extent of this work is unclear at this time.

The alignment identified in the webinar slide shows that the existing lines are located within or adjacent to significant steep slopes, wetlands, the regulatory floodplain, TRCA projects in the Don Valley, TRCA property, and multiple crossings of the Don River. These areas should be avoided where possible and any upgrades will need to be designed to minimize and mitigate impacts.

- Line upgrades between Manby and Riverside have been confirmed and were previously identified in the August webinar. It is our understanding that existing transmissions towers and lines will be refurbished or replaced to achieve the required electricity capacity. The scope and extent of this work is unclear at this time.

The alignment identified in the webinar slide shows that the existing lines are located within steep slopes, potential wetlands, the regulatory floodplain, TRCA property, and multiple crossings of Mimico Creek and the Humber River. These areas should be avoided where possible and any upgrades will need to be designed to minimize and mitigate impacts.

Battery Energy Storage Systems (BESS) – potential development

- It remains unclear whether new BESS facilities will require development within the stretch identified in the webinar (Manby TS to John TS). If so, BESS that require development should aim to avoid TRCA regulated areas and features. If BESS is required within TRCA regulated areas, staff should be engaged as early as possible in the planning/EA process to ensure that requirements are known for these facilities.