

Feedback Form

GTA North Regional Electricity Planning - July 8, 2025

Feedback Provided by:

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

The Independent Electricity System Operator (IESO) is seeking feedback on the draft needs and options screening webinar. A copy of the presentation and webinar can be accessed from the [engagement web page](#).

Please submit feedback to engagement@ieso.ca by July 29, 2025.

Topic	Feedback
Your perspectives on high level wire and non-wire options screening.	It would be helpful to better understand how the assumptions related to electrification and DERs are

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	determined. It seems clear that the IESO gathers the estimates from the LDCs in that region, but does the LDC engage with their municipalities in their catchment on the targets, policies, and targets identified via the Municipal Climate Action Plans? Is there alignment between those assumptions and estimates? If not, why doesn't that occur and what would need to change for that to occur? There seems to be a much bigger emphasis on generation and transmission/distribution system solutions over efficiency and DER to meet electricity needs. The concern related to that predominance on generation and wire solutions is that it is often much more expensive than the efficiency and DER route to reduce the demands on the generation transmission system (which is often a much more expensive option than the efficiency/DER opportunity).
Additional info that should be considered in the assessment of these options.	The assessment should factor in the efficiency and DER opportunities identified in Municipal Climate Action Plans and how those opportunities can reduce the burden and costs on the centralized system.
Perspectives on reducing reliance on York Energy Center, including if transmission is the alternative option.	What value would efficiency and DERs have on the centralized system? What is their cost effectiveness in comparison to the generation and transmission route. How can those larger system benefits be costed out and inform policies and programs to drive the capture of those opportunities?
Information that should be provided in future engagements to help understand perspectives and insights.	How are the assumptions related to electrification arrived at? Does the LDC engage with their municipalities on their Climate Action Plan opportunities and actions? What would the LDCs need from municipalities to bring those into their planning assessments? Information on how the LDCs, IESO, and municipalities are working together to break down the planning silos would be of significant value.

General Comments/Feedback

The IESO's GTA North IRRP relies on LDCs for demand forecasting, which in turn is largely based on population growth, employment targets, and certain assumptions they use about electrification of building heating and transportation that they bring into their planning. The challenge that occurs in that process is that LDC planning doesn't bring into account actions identified as required in Municipal Climate Action Plans. How have the LDCs factored in the opportunities identified in Municipal Climate

Action Plans related to energy efficiency and Distributed Energy Resources? What are the assumptions that LDCs use related to electrification targets/assumptions? How aligned (or misaligned) are they with the opportunities/targets identified in Municipal Climate Action Plans? How can LDCs, municipalities and the IESO work better together to capture those energy efficiency and DER opportunities available to us? How would the advancement of those local energy solutions reduce the costs on the centralized generation and transmission system? How can those benefits be valued and secured via programs and policies associated with the management of the electricity system? LDCs should be required to work with their municipalities to identify what efficiency and distributed energy resources installations are possible based on the modelling that has occurred in municipal Climate Action Plans and the value the securitization of those opportunities would have to the centralized electricity system. Municipalities across southern Ontario are increasingly advancing policies and programs that promote low-carbon energy systems, including district energy, local solar PV installations, solar ready homes, and electrification and energy efficiency measures/technologies in new developments, and retrofits of existing buildings as core strategies to reduce emissions and local energy demand. By not adequately factoring in the demand reduction strategies, the North GTA IRRP risks significantly underinvesting in energy efficiency and DERs and overinvesting in more expensive generation and transmission solutions. This could result in unnecessary infrastructure investments, increased system costs, and slow progress toward shared decarbonization goals. More information on the differences between IESO and LDC electricity planning and municipal climate action plans is outlined here: https://www.cleanairpartnership.org/wp-content/uploads/2023/06/Assessment-of-IESO-Pathways-to-Decarbonization-Study_Final-1.pdf. We encourage the IESO to more fully integrate municipal energy and climate planning into the IRRP process. Closer collaboration with municipalities in the North GTA would provide a more accurate and balanced picture of future electricity needs, one that aligns electricity planning with the local climate action already underway.