

# Feedback Form

## GTA North Regional Electricity Planning - July 8, 2025 Webinar

### Feedback Provided by:

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Date: July 28, 2025

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](mailto:engagement@ieso.ca) by July 29, 2025.**

Topic	Feedback
Your perspectives on high level wire and non-wire options screening.	King Township Staff supports a balanced approach to electricity planning that reflects technical feasibility, environmental protection, and land use compatibility. Wire and non-wire options must be evaluated through the lens

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	<p>of the Our King Official Plan, particularly where infrastructure intersects with the Township's Natural Heritage System, Prime Agricultural Areas, and Oak Ridges Moraine lands. We offer comments in the following three areas in particular: 1. Infrastructure in Natural Heritage and Agricultural Areas: The Township's Official Plan, consistent with the Oak Ridges Moraine Conservation Plan and Greenbelt Plan, requires that infrastructure projects in Natural Core and Linkage Areas must demonstrate that:</p> <ul style="list-style-type: none"> <li>•No reasonable alternative exists;</li> <li>•Disturbance is minimized; and</li> <li>•Ecological integrity is maintained.</li> </ul> <p>Section 4 of the Plan prohibits development and site alteration in key natural heritage and hydrologic features unless these strict criteria are met. Section 6 reinforces that non-agricultural infrastructure in the Countryside must not fragment the agricultural land base or negatively impact ecological functions. The IESO should ensure that all proposed wire infrastructure solutions (e.g., new transmission corridors, step-down stations) are evaluated against the criteria of the Official Plan and avoids siting in Natural Core, Natural Linkage, or Prime Agricultural Areas unless absolutely necessary and justified through rigorous alternatives analysis. 2. Wire Options: Conditional Support with Environmental Safeguards: Township staff acknowledges that there may be the need for new transmission infrastructure to meet regional electricity demand based on certain scenarios. Section 8 of the Our King Official Plan requires that infrastructure in the Oak Ridges Moraine and Greenbelt be planned with:</p> <ul style="list-style-type: none"> <li>• Minimal land disturbance;</li> <li>• Protection of natural features and functions; and</li> <li>• Coordination with local planning and servicing strategies.</li> </ul> <p>The IESO should engage with the Township to ensure that any future decisions related to corridor alignments and station locations are compatible with local and provincial land use designations and avoid sensitive environmental and agricultural areas wherever possible. 3. Non-Wire Alternatives: Strong Alignment with Township Policy: Township staff strongly supports the IESO's continued evaluation of non-wire alternatives (NWAs), including:</p> <ul style="list-style-type: none"> <li>• Energy efficiency and demand management;</li> <li>• Distributed energy resources (DERs);</li> <li>• Battery storage and low-carbon generation;</li> <li>• District</li> </ul>

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	<p>energy systems. These options align with Section 4.10 (Climate Change) and Section 8.6 (Energy) of the Official Plan, which promote:</p> <ul style="list-style-type: none"> <li>• Resilient, low-carbon infrastructure;</li> <li>• Efficient use of land and energy; and</li> <li>• Minimization of environmental impacts.</li> </ul> <p>The IESO should prioritize NWAs in areas where wire solutions would conflict with environmental or agricultural policies and explore opportunities for community-based energy solutions in coordination with the Township.</p>
Additional information that should be considered in the assessment of these options.	<p>Link to the Our King Official Plan:  <a href="https://www.king.ca/development-growth/planning-land-use/official-plan">https://www.king.ca/development-growth/planning-land-use/official-plan</a></p>
Perspectives on reducing reliance on York Energy Center, including if transmission is the alternative option.	<p>King Township Staff offer the following comments regarding the IESO's evaluation of long-term supply options and the potential phase-out of the York Energy Centre (YEC):</p> <ol style="list-style-type: none"> <li>1. Land Use Context and Planning Designation: The York Energy Centre is located on lands designated as Prime Agricultural Area in the Our King Official Plan and the Provincial Agricultural System. The permissions for the facility's use were granted through a Ministerial Zoning Order (MZO) under Ontario Regulation 05/10: Energy Undertakings – Exempt Undertakings, which overrides local planning controls. Should the YEC cease operations, the site would be considered a brownfield, and any future use would be subject to the Township's policies for brownfield remediation and reuse (OP Section 4.9.2).</li> <li>2. Policy Direction on New Energy Generation Facilities: The Our King Official Plan (Policy 8.6.1) prohibits power generation facilities on lands that are designated Oak Ridges Moraine Natural Core Area or Natural Linkage Area; identified as Key Natural Heritage Features or Key Hydrologic Features within the Oak Ridges Moraine Conservation Plan Area; and/or located within the Natural Heritage System or the Holland Marsh Specialty Crop Area of the Greenbelt Plan. The Official Plan further requires that new cogeneration facilities <math>\geq 25</math> MW and new other power generation facilities <math>\geq 5</math> MW, or expansions <math>\geq 5</math> MW to existing facilities, are only permitted through a site-specific amendment to both the Official Plan and the Zoning By-law. These proposals must be supported by: A planning justification report outlining the rationale,</li> </ol>

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	<p>benefits, and local need; A demonstration of conformity with all applicable policies and plans, including mitigation commitments made to other government agencies; Technical studies addressing impacts on: Natural environment and hydrology; Noise, air quality, and emissions; Agricultural land and rural character; Cultural heritage and sensitive land uses. In areas subject to the Oak Ridges Moraine Conservation Plan or Greenbelt Plan, infrastructure is only permitted where it is demonstrated that: No reasonable alternative exists; Disturbance is minimized; Ecological integrity is maintained.</p> <p>3. Retrofit or Repurpose the Existing Facility: Township Planning Staff strongly encourage the IESO to consider in their plans prioritizing the retrofitting or repurposing the existing YEC site to meet future electricity needs, rather than developing a new facility elsewhere in the Greenbelt or Oak Ridges Moraine. This approach would avoid further land consumption and fragmentation of protected countryside; leverage existing infrastructure and grid connections; and align with the Township’s goals for sustainable infrastructure, climate resilience, and agricultural protection.</p>
Information that should be provided in future engagements to help understand perspectives and insights.	<p>1.Detailed Mapping of Proposed Infrastructure: •Clearly identify potential locations for new transmission lines, transformer stations, and generation/storage facilities. •Include overlays of municipal land use designations, natural heritage systems, and agricultural areas to assess land use compatibility. 2. Alternatives Analysis: •Transparently present the rationale for screening in or out specific wire and non-wire options. • Include comparative assessments of environmental, land use, and community impacts. 3.Land Use and Policy Compatibility: •Provide an evaluation of how proposed options align with local Official Plans, the Greenbelt Plan, and the Oak Ridges Moraine Conservation Plan. •Identify any areas where infrastructure may require exemptions or amendments to existing planning frameworks. 4.Technical and Economic Assumptions: •Share the assumptions used in demand forecasting, capacity modeling, and cost-benefit analysis. •Clarify how energy efficiency, distributed energy resources, and demand-side management are factored into planning. 5. Scenario Planning for York Energy Centre:</p>

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	<ul style="list-style-type: none"> <li>•Provide clear options for the future of the York Energy Centre, including retrofit, repurposing, or decommissioning scenarios.</li> <li>•Explain how each scenario aligns with system needs and land use planning policies.</li> <li>•Explore the potential for renewable energy expansion to offset the gap created by the YEC closure.</li> <li>•Provide further modeling on projected grid emissions if natural gas production is expanded, especially in contrast to renewable and nuclear options.</li> </ul> <p>6.Feedback Integration:</p> <ul style="list-style-type: none"> <li>•Demonstrate how previous municipal and community feedback has been incorporated into the planning process.</li> <li>•Provide a summary of key themes from engagement and how they influenced decision-making.</li> </ul>

## General Comments/Feedback

King Township Staff appreciate the chance to comment on the IESO’s GTA North regional electricity planning. As Township Council is on summer recess, these comments are from Staff-only and not Council-endorsed. If the commenting period is extended, Staff will report to Council and seek endorsement. The comments include above are from a municipal planning perspective, grounded in the policies and objectives of the Our King Official Plan. Looking ahead, King Township Staff recommend an ongoing, collaborative approach between the IESO, provincial agencies, and the Township to ensure local perspectives inform all stages of planning and decision-making. It will be essential for the IESO to provide clear, accessible information regarding proposed projects, alternatives considered, and how community feedback has influenced final recommendations. Transparency in technical analysis—especially around environmental and agricultural impacts—will foster trust and encourage meaningful participation from affected stakeholders. In addition, future assessments should consider cumulative impacts on land use, landscape connectivity, and long-term climate resilience, going beyond regulatory compliance to align with the Township’s aspirations for a low-carbon, thriving rural community. Ultimately, King Township Staff remain committed to supporting electricity planning that reflects the unique context and values of King, balancing infrastructure needs with responsible stewardship of natural and agricultural resources.