

Via Email

May 12, 2023

Independent Electricity Systems Operator
IESO Pathways to Decarbonization Study
Email: P2D.Consultation@ontario.ca

Re: IESO Pathways to Decarbonization Study - ERO# 6647019

Thank you for the opportunity to comment on *Pathways to Decarbonization*, ERO #6647019.

A. Background on CELA and LIEN

The Canadian Environmental Law Association (CELA) is a specialty legal aid clinic dedicated to environmental equity, justice, and health. It was founded in 1970 and has been funded by Legal Aid Ontario since 1978. CELA provides free legal services relating to environmental justice in Ontario, including representing qualifying low-income and vulnerable communities in the courts and before tribunals. CELA also provides free summary advice to the public and engages in legal education and law reform initiatives that impact our client communities.

The Low-Income Energy Network (LIEN) is a joint program of CELA and the Advocacy Centre for Tenants Ontario (ACTO) and is funded by Legal Aid Ontario. LIEN's vision is an Ontario where everyone has equitable access to conservation and financial assistance programs and services to meet their basic energy needs affordably and sustainably.

B. Energy System and Low-Income Communities

Low-income and vulnerable communities bear the brunt of the impacts of climate change. There are significant benefits for low-income communities to greenhouse gas mitigation, including more comfortable and safe homes, and fewer climate disasters. A consideration of the benefits of decarbonization should be included in any future electricity system planning. For instance, conservation through energy efficiency upgrades provide significant benefits to low-income communities and should be prioritized.

Energy poverty remains a significant issue in Ontario. Low-income energy consumers do not have the upfront capital or cash flow to transition to either more efficient electric heating, or to switch from natural gas, propane, oil or wood to electricity. As higher income households transition away from the natural gas system, lower income consumers will be left to pay for the natural gas system and will face even higher prices.

It is crucial that more aggressive and better funded energy efficiency programs, along with new fuel-switching programs, are targeted at low-income people. We recommend that homes relying

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on old, inefficient technologies are targeted first, with a plan to upgrade and decarbonize all low-income homes in Ontario by 2035.

To ensure this timeline is met, the Ministry of Energy should set up a task force with social service agencies, low-income advocacy groups, Enbridge Gas, electric utilities, Ministry, and Independent Electricity Systems Operator officials to develop and implement a strategy focused on low-income consumers by 2035.

We also recommend creating programs to assist low-income energy consumers with decarbonized transit options including free transit passes, subsidized leasing and car-share arrangements for electric vehicles, and subsidized electric vehicle charging.

C. Nuclear Energy is not a Safe Alternative

We are opposed to any new nuclear facilities in Ontario. New nuclear facilities should not be considered a “no regrets” action.¹ The recommendation for large new nuclear generating stations, without any site considered, significantly downplays the costs and risks of a new plant. For instance, given the existing population density in Pickering, a new facility at that site should not be allowed because expeditious evacuation near the site would not be possible.

New nuclear facilities will also generate new nuclear waste, which must be stored safely for millennia. There has also been no consideration of the considerable cost of emergency planning required by any new nuclear generating station.

D. Transparency on Modelling

More transparency is needed to examine the appropriateness of the assumptions used for the models. Previous experience in Ontario has demonstrated that large, predicted gaps in electricity generation capacity have not materialized. We are unsure how the “aggressive electrification demand” was calculated for the pathways scenario or whether it is a realistic demand forecast.²

Several scenarios should be modelled to allow for a better assessment of costs and benefits. Other models could stress the value of improved energy efficiency, remove constraints on wind power, and increase solar power generation.

The climate crisis has already resulted in an increase in extreme weather events. We question the decision by the IESO to consider only historical weather data in its models.³

E. Recommendations

Any future electricity system planning must prioritize the well-being of low-income communities.

¹ Independent Electricity Systems Operator, *Pathways to Decarbonization*, December 15, 2022 (“Pathways”), p 5.

² *Pathways*, pp. 2, 12

³ *Pathways*, pp. 12, 16

Because of the very significant costs associated with the IESO's proposal, it is imperative that its data and assumptions are shared and subject to peer review.

We recommend that the IESO study alternatives and model several scenarios to allow for better comparisons of the costs and benefits of various approaches. We recommend a focus on conservation, along with serious consideration of expanded wind and solar power capacity.

Sincerely,

CANADIAN ENVIRONMENTAL LAW ASSOCIATION



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LOW-INCOME ENERGY NETWORK



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