



LiUNA!

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Ministry of Energy and Electrification

Policy Coordination and Outreach Branch

Ministry of Energy and Electrification

77 Grenville Street

Toronto, ON M7A 2C1

Sent via: integratedenergyplan@ontario.ca

Dear Ministry of Energy and Electrification:

***Re: The Labourers' International Union of North America (LiUNA) Response to
an Integrated Energy Resource Plan (ERO Posting #019-9285)***

The Labourers' International Union of North America (LiUNA) is pleased to comment and provide recommendations on the Ministry of Energy and Electrification's Environmental Registry of Ontario (ERO) request #019-9285 for feedback on Ontario's first integrated energy resource plan.

United by collective bargaining agreements, LiUNA is a powerhouse of workers who are proud to build Canada and the United States at large. Our members are a skilled and experienced union workforce trained to work safely in the construction and energy industries. A half-million strong, with over 160,00 members in Canada, 120,000 of which are in Ontario, LiUNA's skilled workforce will play an incremental role in spearheading the province's decarbonization efforts.

As a union publicly known for supporting an "all-of-the-above" energy policy, LiUNA members work in every area of the energy sector, helping to build transmission and distribution facilities, power plants and gas pipelines. We are skilled in the maintenance of nuclear and other electricity generation facilities. LiUNA views this work to be vitally important as according to the IESO's October 2024 updated demand forecast¹, Ontario is projecting a 75% increase in Ontario's electricity needs by 2050, 15% higher than what was projected in February's

¹ "IESO Updated Demand Forecast," IESO, October 17, 2024.

<https://www.ieso.ca/Sector-Participants/IESO-News/2024/10/IESO-Releases-Updated-Demand-Forecast>.

Feel the Power

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Annual Planning Outlook.² For the first time in decades, we find ourselves in a precarious position in which without the right policy planning and actions, Ontario could face not having sufficient electricity to fuel our growing economy.

For this reason, we applaud the Ministry's recent release of the energy policy vision paper, *"Ontario's Affordable Energy Future: The Pressing Case for More Power,"*³. As LiUNA understands, this will set the stage to build out an affordable, reliable, and clean energy future. But this will only be possible if we accelerate the timelines and be bold in the volume of assets being required. The province must also be mindful of including planning considerations related to the staging and availability of skilled trades to build critical infrastructure.

LiUNA welcome's the opportunity to meet with you to further discuss labour in Ontario and the feedback highlighted in our response to the *Guiding Questions* below.

Guiding Questions

What policy options and actions should the Government consider in the integrated energy resource plan to achieve Ontario's vision for meeting growing energy needs, keeping energy affordable and reliable, ensuring customer choice and positioning us to be an energy superpower?

Aligned with the Ontario government, LiUNA is a union publicly known for supporting an "all-of-the-above" energy policy. LiUNA recognizes the importance of diversity in Ontario's energy fleet. Most recently, *Ontario's Affordable Energy Future: The Pressing Case for More Power*⁴ emphasizes Ontario's advantage and underscores the importance of reliability and affordability to that advantage.

² "IESO Annual Planning Outlook." IESO, March 28, 2024. <https://www.ieso.ca/Sector-Participants/Planning-and-Forecasting/Annual-Planning-Outlook>.

³ "Ontario's Affordable Energy Future: The Pressing Case for More Power." Ontario, October 24, 2024. <https://www.ontario.ca/page/ontarios-affordable-energy-future-pressing-case-more-power>.

⁴ "Ontario's Affordable Energy Future: The Pressing Case for More Power." Ontario, October 24, 2024. <https://www.ontario.ca/page/ontarios-affordable-energy-future-pressing-case-more-power>.

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We were very pleased to see Minister Stephen Lecce announce the launch of the LT2 procurement to be technology agnostic. Ontario is in a position where we need comprehensive actions to accelerate the building and procurement of new energy infrastructure.

LiUNA is excited at the recent announcement to consider three new OPG sites for future power generation assets.

We strongly contend that Wesleyville, Nanticoke and Lambton should be reviewed for new large-scale nuclear development. LiUNA also believes that for the Bruce Power C development opportunity, given the advanced nature of planning and work underway related to technology selection and work under the *Impact Assessment Act*, the province should support a near-term technology choice that is proven, low-risk, and available for deployment as quickly as possible to meet our needs in the decades to come. Time is of the essence, and labour needs to be kept mobilized to support these vitally important development opportunities.

Projects like Bruce Power C, which will provide up to 4,800 megawatts of new nuclear capacity to Ontario are critical as aging generation assets continue to be phased out. LiUNA is supportive of Bruce C and other future nuclear generation projects as we are aware of the long-term employment and good paying jobs these projects will provide in Ontario.

LiUNA also strongly supports timely decisions on advancing the refurbishment and return to service of the Pickering Nuclear Generating Station, and the deployment of Ge-Hitachi BWRX-300 small modular reactors at the Darlington Nuclear Generating Station. These are critical assets for the province that will help to support our clean energy future.

In addition, non-nuclear projects such as TC Energy's Ontario Pumped Storage project further highlight the growth in activity needed to safeguard and promote our collective economic interests. According to the Canadian Centre for Economic Analysis (CANCEA), approximately 41,000 person-years of employment will be created through the project – 17,600 directly supported through the construction and operation of the facility.

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Given that most Ontarians rely on natural gas for residential heating, commercial business operation, industrial processes and electricity generation, it is important that the gas system be built and maintained to continue to provide safe and reliable service to deliver on these needs. Over the short, medium and long term, natural gas will continue to play an important role in delivering reliable, resilient, cost-effective energy to customers in Ontario. Natural gas is irreplaceable in the Ontario energy mix in the short to medium term and is expected to remain a critical component of the Ontario energy mix in the long term.

Ontario's expansive natural gas infrastructure represents a distinct competitive advantage for the province and also a critical component of regional energy security and price stability.

More broadly, we are committed to supporting the governments vision to build critical energy infrastructure and bring them online as quickly as possible. However, while our skilled trades workers are ready for this challenge, government must remain cognizant of the growing labour challenges in Ontario and how this may impact the rate in which various projects can be completed. For instance, building just one nuclear power reactor employs up to 7,000 workers at peak construction.⁵ Ontario is also facing an aging labour cohort with needs for training, skills development, and mobilization.

Ongoing collaboration through future iterations of the Skills Development Fund and the exploration into the launch of additional programs that can help incentivise Ontarians to enter the skilled trades workforce will be paramount to assuring Ontario can succeed in undergoing a resource plan that will allow the province to generate affordable and reliable energy while also positioning us to become an energy superpower.

As the need for new transmission infrastructure continues to grow, what steps can government take to ensure that transmitters have the certainty they require to move forward with development work as soon as possible, while also ensuring that competitive pressures keep costs as low as possible?

⁵ "Nuclear Power Jobs." Nuclear Energy Institute, May 1, 2023.
<https://www.nei.org/advantages/jobs>.

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When considering transmission infrastructure projects, LiUNA often collaborates with utilities and customers to make sure that the right skilled trades are available to build these projects. When it comes to certainty to ensure that transmitters are able to move forward with development work as soon as possible, we are cognizant that competitive processes do not always lead to cost effective or efficient outcomes.

Accelerating timelines for development and eliminating the uncertainty of direction is a huge step to ensuring transmission infrastructure has the ability to grow quickly.

The province should support Hydro One to undertake projects as quickly as possible. Given the need for transmission to be ready in a timely manner for certain project commissioning, we would advise the province to avoid transmission projects being subject to untested competitive processes that may put project timelines at risk, or to be subject to the additional time and risks to develop a new greenfield right-of-way.

Further, if there are specific greenfield transmission projects that are designated for competitive processes, we do not support restricting the right of the incumbent transmitter to participate, as this would likely have the counterproductive effect of eliminating what could be one of the most capable suppliers of those services from the pool of participants.

How can the government best support Indigenous leadership and participation in energy planning and projects?

As Canada's largest building trades union, LiUNA and our partners have fostered relationships with many Indigenous communities within Ontario. We applaud the government for the work that has been done to ensure Indigenous communities are involved and hold a leadership role participating in energy planning and large energy infrastructure projects. With construction skills in high demand, LiUNA has supported Indigenous communities through Memoranda of Understanding with the First Nations Major Projects Coalition Society, First Nations Summit, and the Assembly of First Nations. We are also partners with the Aboriginal Apprenticeship Board of Ontario.

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LiUNA would be pleased to meet with government to discuss how we can be an ally as the province moves forward with the planning and siting of new energy infrastructure projects given our experience and relationship working together in a leadership capacity or through the training of members who belong to the communities of our Indigenous partners.

What opportunities should Ontario consider to leverage its position as a clean energy leader?

Ontario should move quickly to ensure new nuclear, transmission, clean fuels and pumped storage projects are advanced without any further delay.

As it is imperative that government focuses on long-term planning, policy stability and a pro-active labour force by mapping out a forward-thinking innovative approach to addressing Ontario's growing labour shortage we would recommend that government looks at additional policies and programs that can work to further grow our labour workforce.

Through other policy submissions LiUNA has provided additional recommendations, which are included here for reference:

- Electricity planning must focus on enabling economic investment. Proactive, long-term resource acquisition strategies, including building clean supply resources and supporting export opportunities, will ensure that Ontario remains competitive. Regular updates to demand-supply forecasts (e.g., semi-annually instead of annually) will improve responsiveness to evolving trends.
- Regional planning should proactively address the growing demands of customers by including actionable solutions in Integrated Regional Resource Plans (IRRPs). Quick responses to customer needs, supported by appropriate risk tolerance adjustments, will further Ontario's goal of becoming a customer-focused energy hub.
- LiUNA recommends that IESO planning should be better coordinated with the Ministry of Municipal Affairs and Housing, the Ministry of Economic Development, Job Creation and Trade, the Ministry of Infrastructure, Infrastructure Ontario, and Invest Ontario, so that we are accelerating the

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planning and connections process and more proactively facilitating economic development and competitiveness.

- Transparent and accessible stakeholder engagement is key. The IESO should reinstate in-person Strategic Advisory Committee (SAC) meetings for all interested stakeholders and enhance individual engagement processes to ensure inclusive and constructive dialogue.
- LiUNA recommends that labour representatives who have insight into mobilizing the skilled trades necessary to accelerate energy capital development be included in the SAC. Additionally, an individual with expertise and insight into skilled trades-related matters related to the energy industry should also be included on the IESO Board of Directors.

The availability of skilled trades is fundamental to the successful execution of electricity infrastructure projects. All planning frameworks, such as the Integrated Regional Resource Plans (IRRP) and the Annual Planning Outlook (APO), should explicitly account for the labour required. We also believe that planning should take into account the staging of capital development and infrastructure projects, so that workers are mobilized quickly, regulations streamlined, and unnecessary government bureaucracy reduced.

Conclusion

In summary, LiUNA would like to thank the Ministry of Energy and Electrification for the opportunity to provide input into Ontario's first Integrated Energy Resource Plan. As an affordable, reliable and domestically produced supply of electricity is the foundation of a stable, Ontario-driven growth strategy, we strongly encourage the government to remain cognizant of the labour component that will be involved in the procurement, building and refurbishment of new and existing projects in Ontario.

We would be happy to meet with you at your earliest convenience to discuss our feedback further.

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With kind regards, I remain

Sincerely,



Joseph S. Mancinelli
International Vice President,
Canadian Director and
Central & Eastern Canada
Regional Manager

cc: The Hon. Doug Ford, Premier
The Hon. Stephen Lecce, Minister of Energy and Electrification
The Hon. Sam Oosteroff, Associate Minister for Energy-Intensive Industries
The Hon. David Piccini, Minister of Labour, Immigration, Training
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