

August 15, 2025

Cisca McInnis
Ministry of Energy and Mines
77 Grenville Street
Toronto, ON
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Canada

Via online submission

Re: Power Workers' Union Submission on the Proposal for Enhancing Transmission Capacity East of Toronto – The Bowmanville to Greater Toronto Area (GTA) Transmission Line (ERO) 025-0658

The Power Workers' Union (PWU) is pleased to submit comments and make recommendations to the Ontario Ministry of Energy and Mines (the Ministry) regarding the Proposal for **Enhancing Transmission Capacity East of Toronto - The Bowmanville to Greater Toronto Area (GTA) Transmission Line (ERO) 025-0658**. The ERO relates specifically to a new double-circuit 500 kV line from Bowmanville Switching Station (Bowmanville) that is being developed to “enable the connection of four new Small Modular Reactors (SMRs), to a new or existing station in the GTA, and associated station facilities.”¹ The project is expected to be in-service in the early 2030s.

The PWU is a strong supporter and advocate for the prudent and rational reform of Ontario's electricity sector and recognizes the importance of planning for low-cost, low-carbon energy solutions to enhance the competitiveness of Ontario's economy. The PWU represents the majority of the skilled workers that operate and maintain Ontario's electricity generation, transmission, and distribution systems. As a union deeply invested in Ontario's safe, reliable, and sustainable energy infrastructure, we recognize the critical importance of new and enhanced transmission capacity and infrastructure.

The PWU applauds the Ministry's proposals for building more electricity transmission (as outlined in Chapter 3 of *Energy for Generations: Ontario's Integrated Plan to Power the Strongest Economy in the G7* (the Integrated Energy Plan or IEP)). The IEP has identified several priority projects, which represent critical transmission projects to alleviate bottlenecks and system constraints. The priority projects on which the Ministry is currently seeking feedback include:

1. **The Barrie to Sudbury Transmission Lines**, to enhance the transmission capacity between northern and southern Ontario; (ERO) 025-0656.
2. **The Orangeville to Barrie Reconductoring Project**, to enhance the transmission capacity between northern and southern Ontario; (ERO) 025-0657.
3. **The Bowmanville to GTA Transmission Line**, to enhance the transmission capacity east of Toronto; (ERO) 025-0658.
4. **The Windsor to Lakeshore Transmission Line**, to support critical transmission infrastructure in southwestern Ontario; (ERO) 025-0659.
5. **The Greenstone Transmission Line**, to enhance the transmission capacity in northern Ontario; (ERO) 025-0660.

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As discussed in the IEP (p.78), the government “will need to maintain the ability to designate projects directly to existing transmitters – such as Hydro One – due to their urgency and complexity.” For each of the above five transmission proposals, the Ministry has designated Hydro One as the transmitter for these justifiable reasons.

The PWU supports each of the above priority projects proposed by the Ministry, as well as the designation of Hydro One as the developer. Hydro One has a proven history of delivering quality transmission projects.

Sincerely,



Andrew Clunis
President
Power Workers' Union

¹ Government of Ontario, Environmental Registry of Ontario, Proposal for Enhancing Transmission Capacity East of Toronto - The Bowmanville to Greater Toronto Area (GTA) Transmission Line (ERO) 025-0658, June 16, 2025. <https://ero.ontario.ca/notice/025-0658>



Power Workers' Union Specific Feedback on the Proposal for **Enhancing Transmission Capacity East of Toronto - The Bowmanville to Greater Toronto Area (GTA) Transmission Line (ERO) 025-0658**

The Ministry of Energy and Mines has requested public feedback on the following proposed actions:

1. Prioritize the Bowmanville to GTA Transmission Line
2. Designate Hydro One as Transmitter
3. Consultation with Indigenous Communities on this Proposal
4. Timing
5. Environmental Impact

1. Prioritize the Bowmanville to the GTA Transmission Line

In this submission, the PWU strongly supports the prioritization of **the Bowmanville to GTA Transmission Line (ERO) 025-0658**. The PWU offers the following reasons for its strong support of this proposal:

- a) This project, a new double-circuit 500 kV line from Bowmanville Switching Station (Bowmanville) will “enable the connection of four new Small Modular Reactors (SMRs), to a new or existing station in the GTA, and associated station facilities.”² The PWU is a strong advocate of the role of nuclear energy in Ontario and Canada’s carbon emissions reduction strategies. We believe that Canada’s SMR technologies represent a significant opportunity to increase the role that low-carbon, nuclear energy can play across the entire country. And we recognize the potential of SMRs to contribute to Canada's clean energy transition.³ **Considering the urgent and accelerating demand for electricity in Ontario, the PWU strongly advocates for the prioritization of this transmission line to ensure that the SMR generation from Darlington will be connected to the grid as soon as possible.**⁴
- b) According to the IEP (p. 70), this project has also been identified by the IESO as high-priority and urgent because it is needed to “send additional electricity to the GTA and downtown core.” Moreover, according to the project proposal, this is a “critical transmission project to alleviate

² Government of Ontario, Environmental Registry of Ontario, Proposal for Enhancing Transmission Capacity East of Toronto - The Bowmanville to Greater Toronto Area (GTA) Transmission Line (ERO) 025-0658, June 16, 2025.

<https://ero.ontario.ca/notice/025-0658>

³ The PWU engaged in federal consultations on the SMR Action Plan and other initiatives related to clean energy. The PWU’s positions on the importance of SMRs and Canada’s clean energy transition are further developed here:

Power Workers’ Submission to SMR Action Plan, Dec 18, 2020

<https://smractionplan.ca/content/power-workers-union>

Power Workers’ Submission on Canada’s Proposed Frame for the Clean Energy Regulations (CER), August 17, 2022

<https://www.pwu.ca/submission-on-the-proposed-clean-electricity-regulation/>

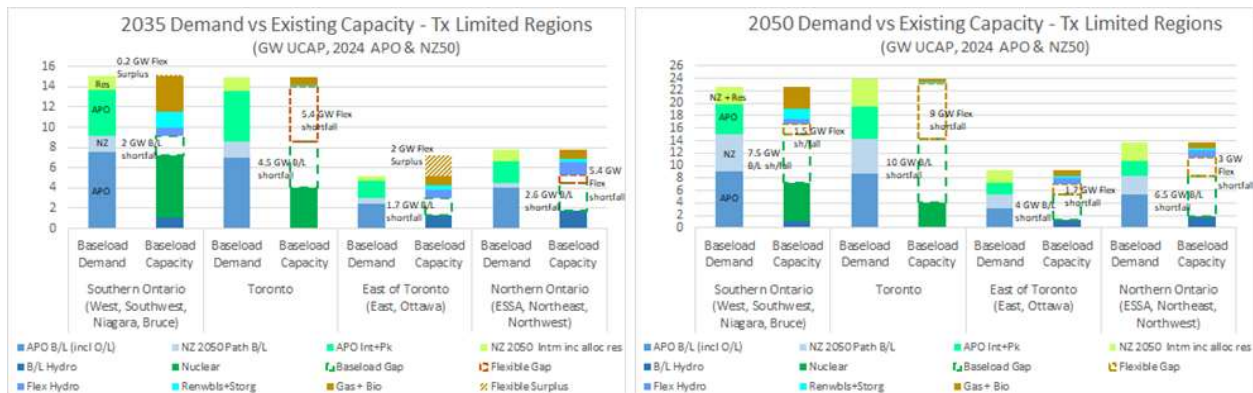
⁴ We also note that these new SMRs will be the first-grid connected SMRs in the G7, so the transmission line to connect them is not only urgent but a historic milestone in global energy transition and nuclear development.

system constraints east of Toronto.”⁵

The IEP emphasizes that the GTA is “key driver of Ontario’s economy” and “ensuring reliable, affordable electricity in this region is essential for the province’s long-term prosperity.” The PWU urges the Ministry to prioritize this project (along with other additional transmission capacity serving the GTA and downtown Toronto) to meet increasing electricity demand in the GTA and alleviate system constraints while supporting new generation east of Toronto.

The PWU supports this project, but emphasizes that in this high-growth period, transmission capacity should be developed quickly but with optimal scoping including consideration of regional reliability needs. Transmission capacity planning should take into account Ontario’s major zonal demand and supply balance forecast, illustrated in Figure 1. Based on these considerations, the justification of future transmission projects should be both rigorous and transparent.⁶

Figure 1 – Ontario Major Zonal Demand and Supply Balance Forecast⁷



For the reasons to be discussed in Recommendation 2 (in the Recommendations section below following the PWU feedback on the proposal), the PWU believes that in the current high-growth environment, the

⁵ Government of Ontario, Environmental Registry of Ontario, Proposal for Enhancing Transmission Capacity East of Toronto - The Bowmanville to Greater Toronto Area (GTA) Transmission Line (ERO) 025-0658, June 16, 2025. <https://ero.ontario.ca/notice/025-0658>

⁶ The PWU’s May 2024 discussion paper on reliability risks explains why zonal transmission interconnection constraints warrant consideration of regional reliability needs. According to the paper, “Ontario has been segmented into zones based on constraints in the transmission system that have evolved over time. The zonal demand implications for 2035 and 2050 are illustrated in Figure 6 [reproduced above as Figure 1] in contrast to existing supply capacities.” This figure highlights the emerging regional needs for baseload supply. A lack of supply options is apparent, particularly for Toronto, in both the 2035 and 2050 forecasts, with supply shortfalls identified in all zones by 2050. For more a more detailed explanation see:

Power Workers’ Union, “Mitigating Ontario’s Electricity System Reliability Risks Requires a New Planning Approach,” May 2024, p. 10.

<https://www.pwu.ca/wp-content/uploads/2024/05/pwu-discussion-mitigating-ontarios-electricity-reliability-risks-may-2024.pdf>

⁷ See previous footnote for explanation of Figure 1 and source.

Ministry should consider prioritizing the building of more transmission assets as soon as possible to address capacity constraints under a higher growth forecast.

In the case of the GTA, in particular, the PWU applauds the Ministry for recognizing that more transmission capacity is needed in this region and for prioritizing this project. However, the PWU argues that especially in the GTA, the electricity system (including transmission capacity) must be upgraded and upsized as soon as possible -- and at a considerably faster pace than that proposed in the IEP.⁸ Most GTA regional governments are actively working towards deep decarbonization. And GTA LDCs (notably Toronto Hydro) are also very supportive of deep decarbonization (and therefore very large growth in electricity demand). Moreover, there are longstanding air quality problems in the GTA which could be greatly attenuated by increased electrification.

Therefore, we strongly recommend that the Ministry also prioritize additional transmission capacity (including a third transmission line to downtown Toronto)⁹ as soon as possible (and ahead of the schedule outlined in the IEP) to address transmission capacity requirements to meet future demand.

As discussed in Recommendation 3 (in the Recommendations section below), the PWU supports efforts to improve regulatory efficiency and expedite the development of priority projects, under the condition that (a) constitutional rights are not compromised, and (b) the objectives of regulatory or environmental processes are not undermined, consistent with the government's existing provisions. Coordination among government agencies should be pursued in a way that enhances clarity and timeliness, while fully respecting legal and constitutional obligations.

2. Designate Hydro One as the Transmitter

The PWU supports the IESO's determination that these transmission lines "are not suitable for a competitive procurement process given their urgent need." (IEP, p. 68). As discussed above, the PWU supports Hydro One, Ontario's largest existing transmitter, as the developer of the priority transmission projects due to their urgency and complexity. Hydro One has a proven history of delivering quality transmission projects.

3. Consultation with Indigenous Communities on this Proposal

The PWU supports advancement of the shared goal of reconciliation with Indigenous communities by providing economic and partnership opportunities in the construction of these transmission lines. We also support the government's commitment to fulfilling its duty to consult with Indigenous communities, as described in the project proposal. As indicated above, the PWU supports the prioritization of **the Bowmanville to GTA Transmission Line (ERO) 025-0658**, under the condition that (a) constitutional rights are not compromised, and (b) the objectives of regulatory or environmental processes are not undermined, consistent with the government's existing provisions.

⁸ The IEP recommends the prioritization of the Bowmanville to GTA Transmission Line with an in-service date in the early 2030s (p. 70). The Plan also discusses early steps taken by the IESO to develop a new IRRP "that will include recommendations for additional transmission capacity into the downtown core." According to the Plan, this new transmission capacity should be "delivered in the early-to-mid 2030s." (p. 71)

⁹ According to the IEP (p. 71), "This work builds on government direction issued through Powering Ontario's Growth, which recognized that Toronto will require a third major transmission line to downtown Toronto to meet future demand, and Ontario's Affordable Energy Future, which highlighted the need to enhance system resiliency."

4. *Timing*

This prioritization should not compromise constitutional rights or undermine the objectives of the province's regulatory or environmental consultative approval process. See our recommendations below for a longer discussion on why building more transmission assets sooner is crucial to avert an electricity crisis and support Ontario's economic growth.

The PWU fully advocates "bringing this proposal forward for a possible decision in later in 2025," such that the transmission line can be in-service in the early 2030s (IESO's recommended in-service date).¹⁰

5. *Environmental Impact*

This prioritization should not compromise constitutional rights or undermine the objectives of the province's regulatory or environmental consultative approval process. We would expect the transmitter to obtain all required government permits and approvals. We note that transmission projects generally have a smaller potential environmental impact than most generation projects and are therefore generally well-suited for prioritization.

Recommendations

While the PWU strongly supports the proposed projects as a significant step in the development of transmission capacity required to meet Ontario's needs, we offer the following recommendations:

1. New transmission assets should be designed to accommodate high growth (as per the priorities for Ontario's Integrated Energy Planning¹¹). However, the PWU believes that the demand forecast should be substantially higher than the high-growth demand forecast referenced in Integrated Energy Plan (IEP).
2. In Ontario's current high demand growth environment, the costs/risks of underbuilding transmission assets are much higher than the costs/risks of right-sizing (or upsizing). Therefore, the Ministry should prioritize the development of greater transmission assets capacity as soon as possible to alleviate potential future constraints under a higher demand growth forecast.
3. The PWU supports efforts to improve regulatory efficiency and expedite the development of priority projects, under the condition that (a) constitutional rights are not compromised, and (b) the objectives of regulatory or environmental processes are not undermined, consistent with the government's existing provisions. Coordination among government agencies should be pursued in a way that enhances clarity and timeliness, while fully respecting legal and constitutional obligations.

Recommendation 1

New transmission assets should be designed to accommodate a high electricity growth forecast (as per the IEP's planning priorities). The PWU believes that the Ministry should adopt an evidence-based demand outlook that is considerably higher than the conservative scenarios presented in the IEP. In our view, the current forecasts significantly underestimate the scale and urgency of Ontario's electrification

¹⁰ Ibid.

¹¹ Government of Ontario, *Energy for Generations: Ontario's Integrated Plan to Power the Strongest Economy in the G7*, June 2025, p. 119.

required to avert an electricity crisis and support economic growth.

The PWU has elaborated on this position in a series of discussion papers published in 2024 on the emerging risks facing Ontario's electricity system and better ways to meet Ontario's growing electricity demand. Each of the discussion papers highlighted reliability, affordability and deliverability risks respectively. PWU's January 2025 summary of these discussion papers¹² emphasized that the reliance on IESO's conservatively low demand forecasts is exacerbating these risks at a time when Ontario is facing an electricity crisis driven by rapidly growing demand. As illustrated in the January 2025 summary,¹³ there is a significant planning gap between the PWU's current Consensus electricity growth forecast of 200% by 2050 and IESO's APO 2025 forecast of 75%. This position aligns with the analysis presented by Marc Brouillette of Strategic Policy Economics (Strapolec) in the paper *"Energy Outlook Implications for Ontario,"* delivered at the CCRE Energy Roundtable in June 2025.¹⁴

Unfortunately, the June 2025 Integrated Energy Plan (IEP)¹⁵ is still "focused on ensuring Ontario can meet forecasted demand under the APO" (with the APO 2025 forecast of a 75% increase in demand by 2050) (p. 23). The IEP does allow for the possibility of higher demand if Ontario consumers "decide to pursue more rapid electrification." However, even under the high-growth demand scenario referenced in the IEP, which is based on the Pathways to Decarbonization (P2D) model, electricity demand increases just over 100% by 2050. This forecast falls well short of PWU's forecast of 200% primarily because the P2D does not consider the economic development and industrial growth recognized by the latest APOs.

Despite the IEP's reference to conservatively low electricity demand forecasts, the PWU supports the following IEP planning priority:

Plan for High Growth: To ensure planning processes are better able to match the pace of growth, the IESO will be expected to coordinate frequent load growth forecasting with utilities and other stakeholders, and to identify transmission projects that would be needed to address capacity constraints that would arise under high growth forecasts. (p. 119)

The PWU fully agrees that Ontario should plan for high demand growth and design transmission projects to accommodate this high growth. To achieve this, Ontario should adopt a risk-informed, evidence-based high-growth demand outlook, which PWU analyses indicate will be significantly higher than the conservative scenarios outlined in the IEP.

¹² Power Workers' Union (PWU), Ontario's Electricity System's Risks and Mitigation – A Recap and Taking Stock, January 2025. <https://www.pwu.ca/ontarios-electricity-systems-risks-and-mitigation-a-recap-and-taking-stock/>

¹³ Ibid, Illustrative Demand and Supply Growth Chart – Ontario, p. 4.

¹⁴ Brouillette, M., Energy Outlook Implications for Ontario CCRE Energy Roundtable, June 2025. <https://thinkingenergy.ca/wp-content/uploads/2025/06/Energy-Outlook-Implications-for-Ontario-Marc-Brouillette-June-19-2025.pdf>

¹⁵ Government of Ontario, Energy for Generations: Ontario's Integrated Plan to Power the Strongest Economy in the G7, June 2025.

Recommendation 2 will explore the risks of higher costs due to underbuilding transmission infrastructure.

Recommendation 2

In a high-growth environment, the costs/risks of underbuilding transmission assets are much higher than the costs/risks of right-sizing (or upsizing) to meet the needs of the province. The IEP lays out the objective to “avoid risks of higher costs” due to over/underbuilding energy infrastructure (p. 120).

The PWU recommends that the Ministry prioritize the development of greater transmission asset capacity as soon as possible to alleviate the potential future constraints under a higher demand growth forecast.

The development of greater transmission asset capacity sooner may be mischaracterized as “overbuilding.” However, in the current environment, even the IEP’s high-growth demand forecast is significantly understated. Therefore, developing greater transmission asset capacity sooner is necessary to (1) meet growing transmission and generation capacity demand and avert an electricity demand crisis while supporting Ontario’s economic growth; (2) reduce existing bottlenecks; (3) improve regulatory efficiency and reduce delays in regulatory approval.

The IEP recognizes what the PWU has long emphasized: to meet accelerating electricity demand between now and 2050, Ontario must rapidly build enough transmission and generation capacity for vitally needed electricity infrastructure and supply. Even under the IEP’s more conservative high-growth scenario, there is very high risk (and high resulting costs) of delays and bottlenecks. Moreover, building enough transmission and generation fast enough in the coming decades will require a massive shift from Ontario’s historical approach to energy planning.

In recent decades, energy planning has been shaped by a prolonged period of flat or declining electricity demand. This reflected a relatively low-growth, low-risk environment driven by factors such as the Great Recession, structural shifts toward a service-based economy, sustained conservation and energy-efficiency gains,¹⁶ and, in the short term, the COVID-19 pandemic. However, as the IEP itself acknowledges, the context has shifted dramatically. Electricity demand is now accelerating at a pace widely recognized across the sector, driven by electrification, population growth and industrial expansion.

Despite this shift, the IESO’s demand forecasting and planning has retained a conservative approach rooted in this previous low-growth era. In the current context, this approach is inappropriate and underestimates capacity requirements. As a result, there have been growing forecasted resource adequacy gaps since 2023. This trend continued with the 2025 APO and is likely to persist when the next round of higher demand forecasts is released.

¹⁶ Canada Energy Regulator, “Market Snapshot: Why is Ontario’s Electricity Demand Declining,” March 21, 2018. <https://www.cer-rec.gc.ca/en/data-analysis/energy-markets/market-snapshots/2018/market-snapshot-why-is-ontarios-electricity-demand-declining.html>

This new context (characterized by accelerating electricity demand) strongly preferences right-sizing (or upsizing) transmission to reduce the costs/increase efficiencies for all of the required inputs/steps, including planning, approvals, obtaining right of way/land for lines and substations, etc.

Building more transmission assets sooner makes economic sense in the current high-growth environment even when such assets are ahead of immediate needs. There are typically strong economies of scale associated with upsizing transmission assets (especially in the same corridor or on the same circuit). Economies of scale results in lower per unit costs, as well as efficiencies related to regulatory processes, even if these processes are streamlined and fast-tracked.

In recent years (and perhaps ongoing), there has been a significant inflation/cost escalation affecting energy infrastructure in Canada and other countries. Therefore, building more transmission assets sooner in an inflationary environment can be much less costly than building later.

Recommendation 3

The PWU supports efforts to improve regulatory efficiency and expedite the development of priority projects, under the condition that (a) constitutional rights are not compromised, and (b) the objectives of regulatory or environmental processes are not undermined, consistent with the government's existing provisions. Coordination among government agencies should be pursued in a way that enhances clarity and timeliness, while fully respecting legal and constitutional obligations.

In particular, when the Major Project Identification Committee (MPIC) has identified a priority transmission project¹⁷ that is in the public interest, the PWU recommends that the appropriate government agencies and stakeholders receive clear direction from the Ministry of Energy and Mines about their roles and responsibilities in expediting the different stages of project approval.

Conclusion

There is evident urgency to creating an effective energy planning framework for Ontario. The PWU applauds the efforts to introduce integrated energy planning in the IEP, including plans to build more transmission assets to address capacity constraints under a higher-growth forecast. As emphasized above, the PWU strongly supports each of the proposed priority transmission projects, including the prioritization of the Proposal for the **Bowmanville to Greater Toronto Area (GTA) Transmission Line (ERO) 025-0658**. However, the PWU reiterates that:

1. New transmission assets should be designed to accommodate high growth, and the high-growth demand forecast should be substantially higher than the high-growth forecast in the IEP.
2. In a high-growth environment, the costs/risks of underbuilding transmission assets are much higher than the costs/risks of right-sizing (or upsizing). Therefore, the Ministry should consider prioritizing the building of more transmission assets as soon as possible to address capacity constraints.

¹⁷ See Sections 4 and 7 of Schedule - Order in Council 803/2025, June 11, 2025, <https://www.ontario.ca/page/schedule-order-council-8032025>

3. The PWU supports efforts to improve regulatory efficiency and expedite the development of priority projects.

The PWU has a successful track record of working with others in collaborative partnerships. We look forward to continuing to work with the Ministry and other energy stakeholders to strengthen and modernize Ontario's electricity system. The PWU is committed to the following principles: Create opportunities for sustainable, high-pay, high-skill jobs; ensure reliable, affordable, environmentally responsible electricity; build economic growth for Ontario's communities; and, promote intelligent reform of Ontario's energy policy.

We believe these recommendations are consistent with, and supportive of Ontario's objective "to build-out of an affordable, reliable and clean energy system to meet the exceptional growth needs of Ontario." The PWU looks forward to discussing these comments in greater detail with the Ministry and participating in the ongoing stakeholder engagements.

List of PWU Employers

Abraflex
Alectra Utilities (formerly PowerStream)
Algoma Power
Aptum (formerly Cogeco Peer 1)
Atlantic Power Corporation - Calstock Power Plant
Atlantic Power Corporation - Kapuskasing Power Plant
Atlantic Power Corporation - Nipigon Power Plant
Atura - Brighton Beach Power
Atura – Halton Hills Generating Station
Atura – Napanee Generating Station
Atura - Portlands Energy
Bracebridge Generation
Brant County Municipality
Brookfield Power Wind Operations
Bruce Power Inc.
Canadian Nuclear Laboratories (AECL Chalk River)
Capital Power East Windsor
Capital Power Goreway
CC Nuclear
Centre Wellington Hydro
Compass Group (Bruce, Darlington, Pickering, PLC/Brock Rd.)
Cornwall Electric
Elexicon (formerly Whitby Hydro)
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Enwave Windsor
EPCOR Darlington Demineralized Water Plant
EPCOR Electricity Distribution Inc.
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Lakeland Power Distribution
Laurentis Energy Partners
London Hydro Corporation
Milton Hydro Distribution Inc.
Mississagi Power Trust
NAES
Newmarket Tay Power Distribution
North Bay Hydro
Northern Ontario Wires
Nuclear Waste Management Organization
Ontario Power Generation Inc.
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Quality Tree Service

Reworld Durham York Limited Partnership (Formerly Covanta Durham York Renewable Energy)
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Sioux Lookout Hydro Inc.
SouthWestern Energy
Synergy North (formerly Kenora Hydro Electric Corporation Ltd.)
The Town of Tillsonburg
Toronto Hydro
TransAlta Generation Partnership O.H.S.C.
Westario Power