

December 3rd, 2025

Dear Members of the Infrastructure and Environment Committee,

As Executive Director of the Climate Action Partnership, I urge the Committee—and Toronto City Council—to provide strong input to the Independent Electricity System Operator (IESO) on its draft Integrated Regional Resource Plan (IRRP) for Toronto, and to support a request for Ontario’s Auditor General to conduct a full, independent review of its implications for affordability, air quality, and Toronto’s net-zero commitments.

Affordability is a growing concern for residents and businesses. Your own modeling shows that the most cost-effective way to keep bills down is through energy efficiency and distributed energy resources (DERs) that reduce peak demand and avoid costly infrastructure. These “negawatts,” along with solar, storage, and smart charging, cut the need for new bulk generation and provide resilience during extreme weather.

Yet the draft IESAO Toronto IRRP doubles down on centralized generation and transmission—an far more expensive approach. While some large-scale infrastructure will still be needed, over-reliance on it ignores proven, lower-cost alternatives and risks locking ratepayers into higher costs.

[The Assessment of the IESO’s Pathways to Decarbonization Study – From the Perspective of Municipal Climate Action Plans](#) reinforces the threat this misalignment poses. The IESO’s planning framework systematically underestimates the potential of local action while overestimating future electricity demand growth. Municipal climate plans across Ontario—including Toronto’s—show electricity demand rising at approximately 1% annually, not the IESO’s projected 2.7%. These plans also demonstrate that distributed energy resources, deep efficiency, and local solar can dramatically reduce the need for costly bulk-system expansion. The Assessment warns that leaving efficiency and local generation opportunities on the table—and over-relying on big generation and transmission - will be far more expensive that if those energy efficiency and local energy generation opportunities were advanced. In addition, there are collective savings from the decarbonization of the electricity system that have not been brought into the IESO’s mandate and decision making that is a fundamental flaw in ensuring Ontario taxpayers are securing value for their money across provincial costs and not just simply focused on electricity rates. Below are the additional value calculations highlighted in the [Assessment report](#) resulting from decarbonizing the US electricity system.

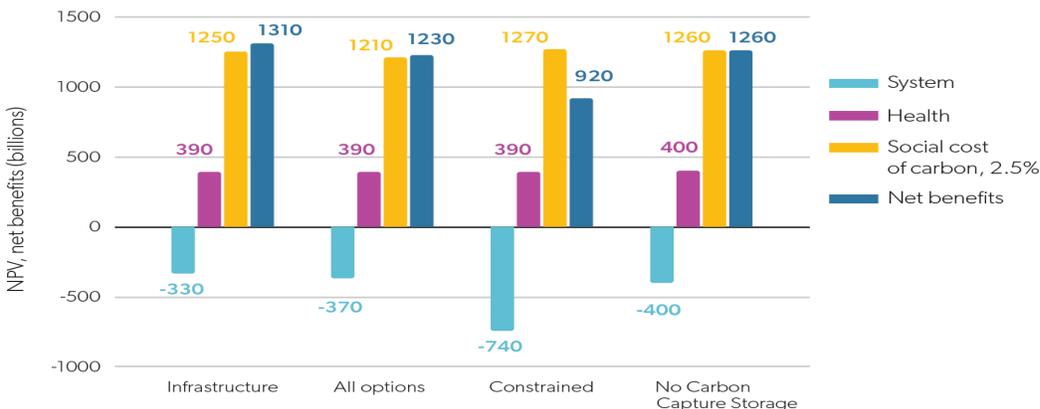


Figure 8. Net present value of decarbonising the US electricity system, including health, and avoided climate change impacts.¹³ Negative values equal costs and positive values equal savings.

An Auditor General review is essential to determine whether the IRRP:

- Raises energy costs unnecessarily in comparison to increased investments in efficiency and DERS
- Exposes Torontonians to avoidable air pollution
- Undervalues cost-effective local solutions
- Undermines Toronto's 2040 net-zero target
- Creates financial risks from overbuilt infrastructure

Toronto needs an electricity plan that reflects the climate emergency, affordability crisis, and the low-carbon transition already underway.

Climate action Partnership supports the recommendations to:

1. Advise IESO that its draft IRRP is incompatible with Toronto's climate commitments.
2. Request Toronto Hydro develop a net-zero-aligned supply strategy.
3. Call on the Auditor General for a full review of the IRRP's cost and health impacts.

Toronto deserves an electricity future that is as affordable as it can possibly be, considers and incorporates public health costs resulting from energy decisions, aligned with our climate goals and advances Ontario's readiness for the emerging low carbon energy transition rather than simply doubling down on the big generation, big transmission energy system of the past.

Sincerely
Gaby Kalapos
Executive Director
Climate Action Partnership