



Clarington

Mayor Adrian Foster

May 12, 2023

Hon. Todd Smith, Minister
Ministry of Energy
77 Grenville Street
Toronto, ON
M7A 2C1

To Minister Smith,

The Municipality of Clarington supports the government of Ontario's vision of a decarbonized electricity system while balancing Ontario's energy needs, as well as the reliability of the grid and affordability for customers.

Clarington is home to Ontario Power Generation's (OPG) Darlington Nuclear Generating Station, which provides around 20 per cent of Ontario's electricity supply. As such, we believe we are in a unique position to provide comments on the ERO Posting (ERO Number 019-6647).

The following is a response to the Independent Electricity System Operator's (IESO) study on *Pathways to Decarbonization* and the "no-regret" recommendations, more specifically Questions 1, 2, 3, 5 and 6.

Response:

The Ministry of Energy is seeking feedback on the recommendation to streamline the regulatory, approval and permitting process of new generation and transmission infrastructure. Site considerations and environmental monitoring programs for new nuclear reactor sites are regulated by the Canadian Nuclear Safety Commission (CNSC). The Municipality of Clarington recognizes that this process is crucial for public confidence in the safety of the system and for the community. Current nuclear facilities have stringent compliance requirements for monitoring and reporting on an ongoing basis. Any consideration of streamlining processes for approvals/permitting of the Darlington Nuclear New Build Small Modular Reactor would be of concern. The

technology is new to our community, the design is somewhat novel and success of the first SMR New Build will be essential for the adoption of these plants on a global scale. The Darlington Nuclear Generating Station and OPG have a proven track record of safety and regulatory compliance at the Federal and Provincial level. The Municipality of Clarington strongly believes that the Ministry should investigate the feasibility of existing nuclear sites as the primary location(s) for investment in new power generation. This would provide the opportunity to leverage existing safety and environmental monitoring programs to inform discussions on new nuclear licenses and streamline the regulatory approval process.

Additionally, by investing in existing nuclear sites, the Ministry can build upon relationships with the public and Indigenous groups that have already been actively involved in the project. Host communities also tend to be more engaged in and knowledgeable about the industry, which can further accelerate the engagement process.

The Ministry is also seeking feedback on whether investments should be made in clean energy resources and emerging technologies, noting that it is likely to increase electricity costs. The Municipality of Clarington believes that investment in innovation is a crucial step in Ontario's decarbonization plans. It is possible to balance the need for technological investments with the higher electricity costs by building on existing nuclear sites while also increasing access to initiatives that improve energy efficiency and advance adoption of Distributed Energy Resources (DERs). Increasing access to energy conservation and demand management programs would help offset higher electricity costs for residents and businesses.

Summary:

The IESO's *Pathway to Decarbonization* study provides recommendations on how to achieve a zero-emission electricity system by investing in new nuclear generating sites, low-carbon fuels, and energy conservation and demand management programs. The Municipality of Clarington supports the Ministry's efforts to decarbonize the grid and requests that the Province leverage existing nuclear facilities and their demonstrated regulatory compliance when deciding sites for further investment, as well as improve access to energy efficiency initiatives in all sectors to balance an increased electricity cost to ratepayers.

Yours truly,



Adrian Foster, Mayor