



Corporation of the County of Bruce  
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[brucecounty.on.ca](http://brucecounty.on.ca)

April 20, 2023

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

Dear Minister Smith,

Bruce County supports the government of Ontario's goal to ensure that the building blocks are in place for an integrated energy plan that meets Ontario's energy needs, while maintaining reliability, affordability and our clean energy advantage. As a central part of the [Clean Energy Frontier](#), Bruce County knows both the environmental and economic importance of the energy sector in the daily lives of Ontarians.

Bruce County is host to Bruce Power, the world's largest operating nuclear power generating station, so we believe that we are well suited to provide comment on the ERO posting. The following are comments in response to the province's Environmental Registry of Ontario (ERO) Postings 019-6647 which seek feedback on the findings of the Independent Electricity System Operator's (IESO) *Pathways to Decarbonization* study.

The IESO Pathways to Decarbonization study ERO posting poses nine questions. Bruce County's response will specifically focus on Questions 1, 2, 5 and 9.

#### Questions:

The Province of Ontario is seeking input on the appropriate regulatory requirements to achieve an accelerated infrastructure buildout. As a host community to Bruce Power, Bruce County is keenly aware of the importance of ensuring regulatory requirements are maintained and monitored to support safe and resilient communities. The Canadian Nuclear Safety Commission (CNSC) regulates new nuclear reactor designs and site preparation work and outlines a significant series of steps needed to access a license required for new nuclear construction. Site design considerations and environmental monitoring are all large parts of this process, and often take a significant amount of time. Current nuclear sites are required to undertake radiological and environmental monitoring programs. These programs are required to be completed on an ongoing basis to ensure compliance with many of the other licenses required to operate a nuclear facility. Not only are these important

studies but they provide a great opportunity to inform and expedite early-stage discussions for new nuclear licensing processes. In our community, Bruce Power continues to show, through their annual [environmental protection reports](#), that they are continually meeting all relevant Federal, Provincial, and regulatory requirements and legislation. Furthermore, they are doing more to measure and minimize their impact on the environment. As a result of this ongoing and robust study of existing nuclear sites in Ontario, Bruce County believes that the province should first consider existing nuclear sites as the primary location to invest in new power generation in order to meet the goals and scenarios outlined in *the Pathways to Decarbonization* report. Existing nuclear sites have the environmental data and strong safety record to demonstrate they can be tasked with siting new clean generation and storage infrastructure.

The Pathways to Decarbonization report notes that large infrastructure projects can take 10 to 15 years to build, however the planning, siting and environmental work needed to move these projects forward can hamper the goal of transitioning away from natural gas. The report recommends that these processes should begin immediately. We believe that Ontarians and Canadians are ready to see this investment in the energy sector as well. Recent polling commissioned by the Nuclear Innovation Institute found that approximately 60% of Canadians support beginning environmental and impact assessment process now to keep the door open for new nuclear generation in future years.

As a host community and a key part of Ontario's Clean Energy Frontier we believe it is time to start the conversation about investment in new nuclear generation. Existing sites, such as the site located in Tiverton, should be the first considered when looking at new nuclear projects. The use of these existing sites provides an opportunity to streamline not only the processes but the consultation that needs to occur. Areas like Bruce County have a high level of citizen engagement, knowledge of the industry and acceptance of large-scale energy projects due to the existing infrastructure that is in place. In fact, recent polling by the Nuclear Innovation Institute has shown that 73% of Canadians believe that nuclear power plants have been built and operated safely for 60 years<sup>1</sup>. Furthermore, Indigenous leaders and businesses are actively involved with projects on site and are partners for continued growth of the energy sector. This is demonstrated most clearly in polling conducted by Ipsos in Spring of 2022 that focused on the Clean energy Frontier region (Bruce, Grey and Huron Counties). The polling found that 86% of residents familiar with Bruce Power have a favourable opinion of the company while 92% of all residents believe that Bruce Power is involved in the community in a good way<sup>2</sup>. Bruce County believes that consulting early and often with the public and key stakeholders is an important part of any large infrastructure project in Ontario. Building on existing relationships between local governments, indigenous communities and the public in nuclear host communities, such as Bruce County, will assist the provincial government expedite the planning and siting of new nuclear generating facilities in Ontario.

<sup>1</sup> [Nuclear Innovation Institute, 2023](#)

<sup>2</sup> [Ipsos, 2022 - Bruce, Huron 7 Grey Counties Public Opinion Research Tracking](#)

Investing in new nuclear generation, particularly on existing sites, has the opportunity to enable the development of other energy opportunities such as hydrogen and other low-carbon fuels. Existing nuclear facilities rely on developed clusters of innovative companies, who provide a suite of supportive products and services to clean energy. These companies continue to learn and adapt to changing technology that would not only support the expedited construction of new nuclear projects, but the growth of additional energy projects enabled by these sites. Growth of hydrogen and other low-carbon fuels continues to be at the top of this list. There are many examples of businesses in Bruce County to support the growth of this type of energy source. The *Pathways to Decarbonization* report estimates capacity of an additional 15,000 MW of hydrogen capacity that could be supported through the growth of the nuclear sector.

## Summary

The IESO Pathways to Decarbonization Study provides the beginning of a roadmap for additional investment in the Energy Sector in Ontario. As a nuclear host community, Bruce County wishes to express support for the siting of new nuclear facilities in Ontario and for prioritizing Ontario's existing nuclear sites for consideration. Furthermore, we would like to ask the government to support expediency in requests from existing facilities to expedite the continued transition to Net Zero in Ontario.

Most sincerely,

Chris Peabody  
Warden  
County of Bruce

<sup>1</sup> [Nuclear Innovation Institute, 2023](#)

<sup>2</sup> [Ipsos, 2022 - Bruce, Huron 7 Grey Counties Public Opinion Research Tracking](#)