



Corporation of the County of Bruce
30 Park Street, P.O. Box 70,
Walkerton, ON, N0G 2V0

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 years¹. 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 way². 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.

¹ [Nuclear Innovation Institute, 2023](#)

² [Ipsos, 2022 - Bruce, Huron & 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
Bruce County

¹ [Nuclear Innovation Institute, 2023](#)

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



Committee Report

To: Councillor Steve Hammell, Chair and
Members of the Planning and Development Committee

From: Claire Dodds
Director of Planning and Development

Date: April 20, 2023

Re: Response to Independent Electricity System Operator's (IESO)
Pathways to Decarbonization Study

Staff Recommendation:

That the draft response and the notice of motion from April 6, 2023 be circulated to Clerks/CAOs at local municipalities in Bruce County and other nuclear host communities in Ontario, as presented; and

That staff submit the comments as presented to the province through ERO Posting #019-6647, IESO Pathways to Decarbonation Study.

Background:

On December 15, 2022, the Independent Electricity System Operator (IESO) released the "Pathways to Decarbonizations" (P2D) study. The Ministry of Energy is seeking feedback on the findings of the P2D study through the Environmental Registry of Ontario. The province outlined nine individual questions that they were seeking additional input on that spanned many different topics of the report related to the "no-regret" recommendations.

Council passed a motion on April 6th, 2023 directing staff to prepare comments in response to the ERO posting. County staff worked with staff from Nuclear Innovation Institute to prepare these comments.

The response focuses on three key questions from the ERO posting that are relevant to Bruce County:

- requested input on the opportunities streamlining regulatory approvals for new large infrastructure projects;
- consultation requirements with host and indigenous communities; and
- the process required to support investment in new and additional clean energy projects.

If Council is supportive of these comments, this letter will be circulated to local municipalities in Bruce County, as well as other nuclear host communities in Ontario. It will also be submitted through the ERO portal to be included as formal input on the study.

Financial/Staffing/Legal/IT Considerations:

There are no financial, staffing, legal or IT considerations associated with this report.

Interdepartmental Consultation:

The Planning and Development Department consulted with staff from the Nuclear Innovation Institute to assist in developing the attached comments. The CAOs office was also consulted in the preparation of these comments.

Link to Strategic Goals and Elements:

- Goal # 9 - Coordinated, concerted effort to advance our agenda
- B. Politicians and staff lobby associations and government in support of local policy needs.
 - C. Make political and staff participation in provincial and federal committees a priority

Report Author:

Jeff Loney
Economic Development Manager

Departmental Approval:

Claire Dodds
Director of Planning and Development

Approved for Submission:

Derrick Thomson
Chief Administrative Officer