The IAAC should evaluate if Ontario's electricity needs could be met at a lower cost through an integrated combination of energy efficiency, demand management, wind and solar energy, water power, and energy storage.

According to section 2 of the IAAC's Summary of the Draft Integrated Guidelines for this project, the IAAC is expected to:

> Evaluate alternative means of carrying out the project (e.g., different locations or technologies) and present how choices were justified based on:
> ♣ Technical and economic achievability
> ♣ Potential environmental and health effects
> ♣ Impacts on Indigenous Peoples and public interests

However, in Section 2.8.3 of the Draft Integrated Tailored Impact Statement Guidelines, the IAAC says it will:

> "rely on the proponent's Initial Project Description demonstrating that there are no alternatives to the project that are technically and economically feasible to meet the need for the project and achieve its purpose."

However, the proponent's claim denying the technical and economic feasibility of alternatives is incorrect for the following reasons.

- Ontario's Independent Electricity System Operator (IESO) is procuring new wind and solar power costing only 8.8 cents per kWh, 30% less expensive than OPG's current price of nuclear energy and 60% less expensive than OPG's proposed price for its nuclear energy next year.
- According to Lazard, new wind and solar combined with storage is 50% cheaper than new nuclear reactors.
- According to the IESO, wind and solar combined with battery storage can provide Ontario with reliable 24/7 electricity at a lower cost than new nuclear reactors.
- Great Lakes offshore wind power with a lakebed footprint of less than one square km could meet all of Ontario's electricity needs.
- Solar farms with a footprint equal to 4/10ths of 1% of Ontario's land area could also meet 100% of Ontario's electricity needs.
- Rooftop, balcony, and parking lot solar also have a huge potential.

I therefore urge the IAAC to adhere to its Draft Integrated Guidelines and include in its assessment of this project, the technical and economic feasibility of alternatives to what the proponent has recommended.