## Link to ERO notice on New Requirements for Data Centres Seeking to Connect to

the Electricity Grid in Ontario: <a href="https://ero.ontario.ca/notice/025-1001">https://ero.ontario.ca/notice/025-1001</a>

Comments close: Tuesday, November 4, 2025, 11:59pm

## Response:

- 1. No, I do not support the proposal. I do not think that electricity connections should be prioritized for data centres because they do not and cannot demonstrate the benefits listed above. Prioritizing electricity to data centres in most cases leads to higher utility bills for ratepayers, new government expenses/debt, more pollution and weaker environment, economic inequality, and increased electricity generated from fossil gas and nuclear. Policy that encourage the development of AI data centres should not be considered where the direct and indirect costs outweigh the benefits. The costs of AI data centres significantly outweigh the benefits to a point where they do not provide economic, strategic, security, and local community benefits for Ontarians in the long-run or as a whole.
- 2. The AI data centres must be under 1-5MW maximum in size, be 100% Canadian-owned and financed, and run as a cooperative. It must not produce any water pollution or cause displacement that harms or risks human health, other species, and ecosystems. Third, it must not demand large amount of water or energy at the cost of the environment and people. Fourth, it must not increase the electricity and water bills of Ontario ratepayers nor require any government subsidization in the long-run, ever. Finally, none of the companies can be Google, Amazon, Microsoft, Meta, OpenAI, or another large, billionaire tech company.
- 3. Have continuous, transparent public consultation with local residents and climate groups across Ontario, with adequate time for receiving feedback. This includes conducting public surveys and hosting multiple in-person and virtual town hall meetings. Concentrating energy decision-making to politicians and a small group people is undemocratic and will lead to harming people and our ecosystems. Moreover, the water and energy implications of approving and building large AI data centres are not going to be captured responsibly or in the best interest of Ontarians unless treaty rights are respected.
- 4. Timelines should match the pace of proper and in-depth consultation with local residents, climate groups, and academic experts in the area of AI data centres and their energy/water intensity. Do not rush the process to approve AI data centres.
- 5. Governments must prioritize the electricity needs of everyday people before energy-intensive industries. The province should be working toward meeting the electricity needs of people and local businesses to transition to renewable energy (wind, solar, water). I demand the Ministry of Energy and Mines to prioritize the electricity needs of industries that are making the most investment and headway in energy and water reduction and moving away from energy from fossil fuels.

6. Quote from Dr. Tamara Kneese: "While data center operators promise good jobs and economic stimulation, residents do not necessarily reap the economic benefits of data center buildout and data center jobs are often short-term contract positions. To offset this kind of power imbalance, community benefits agreements can ensure that communities receive guarantees of well-paying, long-term jobs and workforce training, tax revenue for local schools, transit, and other public goods, direct payments for public parks, affordable housing, and other benefits, payments for third-party audits and penalties for pollution, and ongoing environmental review."

## 7. N/A

- 8. Passing a bill similar to the Power Act in Oregon: In June 2025, "the Oregon House of Representatives passed the Protecting Oregonians With Energy Responsibility (POWER) Act (HB 3546)...The legislation addresses one of Oregon's most pressing energy challenges: rising utility costs driven in part by the explosive growth of energy-intensive data centers."
- 9. Yes, but only one that is of a much higher electricity rate class and collects enough revenues to pay for all the direct and indirect environmental and health damages that the new Al data centres will cause. The revenues collected from the higher electricity rate class cannot go into fossil fuels or nuclear expansion, and must go to ensuring new renewable electricity and energy reduction programs.
- 10. I do not think that there should be data centre policy tools or incentives in northern Ontario or anywhere in Ontario. Instead, there should be disincentives created such as a 50% tax on data centres, and an additional up-front payment from centres to cover 100% of the direct and indirect environmental damages, and cost increases in utility bills for all ratepayers over its lifespan.

## **Helpful links to submit:**

https://thenarwhal.ca/great-lakes-data-centres-threat/

https://www.unep.org/news-and-stories/story/ai-has-environmental-problem-heres-what-world-can-do-about

https://datasociety.net/library/data-centers-arent-the-future-of-american-prosperity/

https://iee.psu.edu/news/blog/why-ai-uses-so-much-energy-and-what-we-can-do-about-it

https://medium.com/afrosapiophile/why-ai-hurting-black-communities-is-textbook-case-of-systemic-racism-31591508b257

https://www.nytimes.com/2025/10/20/technology/ai-data-center-backlash-mexico-ireland.html

https://robertreich.substack.com/p/beware-the-oligarchs-ai-bubble

https://www.techpolicy.press/why-are-tech-oligarchs-so-obsessed-with-energy-and-what-does-that-mean-for-democracy/

https://www.techpolicy.press/measuring-ais-environmental-impacts-requires-empirical-research-and-standards/

https://www.theglobeandmail.com/business/article-data-centres-are-popping-up-everywhere-but-a-jobs-boom-is-unlikely/#:~:text=Microsoft%2C%20for%20example%2C%20operates%20two,local%20suppliers%2C%20manufacturers%20and%20others

https://naacp.org/articles/elon-musks-xai-threatened-lawsuit-over-air-pollution-memphis-data-center-filed-behalf

https://oregoncub.org/news/blog/oregon-house-passes-power-act-with-strong-bipartisan-support/3160/