



CMD 26-H104.5

Date : 2026-04-23

**Written Submission from
the Power Workers' Union**

**Mémoire de la
Power Workers' Union**

In the matter of the

À l'égard du

Bruce Power

Bruce Power

Application to amend the licensing basis for Bruce A and B nuclear generating stations to increase reactor power limits

Demande de Bruce Power visant à modifier le fondement d'autorisation des centrales nucléaires de Bruce-A et B afin d'augmenter les limites de puissance des réacteurs

Hearing in Writing

Audience par écrit

July, 2026

Juillet 2026

April 22, 2026

Commission Registrar

Canadian Nuclear Safety Commission (CNSC)

Via online submission

Re: Ref. 2026-H-104 — Bruce Power application to amend licensing basis for Bruce A and Bruce B to increase reactor power limits (Project 2030)

Commission Registrar,

On behalf of the Power Workers' Union (PWU)—Ontario's largest electricity sector union representing over 19,000 highly skilled workers, including thousands of members at Bruce Power, I am writing to express our support for Bruce Power's application to amend the licensing basis for the Bruce A and Bruce B nuclear generating stations to increase reactor power limits, as part of Project 2030.

Ontario's electricity system is entering a period of sustained demand growth driven by electrification and economic development. The Independent Electricity System Operator (IESO) projects electricity demand growth of 65% by 2050, underscoring the need to act now to maintain reliability while protecting Ontario's clean-electricity advantage.

The PWU's position is clear and consistent, Ontario must expand and modernize nuclear generation as a cornerstone of a reliable, affordable, and low-carbon electricity system, and we support steps that optimize output from existing nuclear assets while upholding Canada's world-class safety requirements.

As documented by the CNSC notice for this proceeding, the current licensing basis authorizes Bruce Power to operate at a maximum reactor power level of 92.5% full power (Bruce A) and 93.0% full power (Bruce B). Bruce Power has applied to increase those limits to 95.5% full power for Bruce A and 96.0% full power for Bruce B. This change is part of Project 2030, which aims to increase the capability of the Bruce A and Bruce B stations to 7,000 MW by the early 2030s.

From a system-planning perspective, optimizing the output of existing, proven baseload infrastructure is a practical "do-more-with-what-we-have" approach that supports reliability and affordability while Ontario builds the additional supply and grid infrastructure needed for the 2030s and beyond.

Ontario's clean nuclear provides approximately half of Ontario's electricity 24/7, regardless of weather. Nuclear is the dominant low-emission power source for Ontario's grid which is almost 90% emissions-free.

The Ontario government's Integrated Energy Plan (Energy for Generations, June 2025) sets out a roadmap that includes nuclear refurbishment and new nuclear generation to meet future needs, and it explicitly recognizes the ongoing importance of major nuclear assets such as Bruce.

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Project 2030 is described as being on track to increase site net peak power from 6,300 MW (2016) to 7,000 MW through the 2030s. This includes adding new output from the existing generating units almost equivalent to one new large-scale reactor.

Bruce Power also reports measurable progress already achieved through asset optimization, including an increase of 184 MW of net peak capacity to date and a recently reported site generation peak of 6,584 MW.

The PWU supports policies that keep energy investment—and the resulting skilled work—rooted in Ontario and Canada. Bruce Power states that 95% of its spending stays in Canada, spanning operations, capital investments, and procurement. This type of domestic supply-chain impact aligns with the PWU's long-standing advocacy for a reliable, Canadian-centered electricity strategy that supports high-skilled jobs and strengthens communities.

The PWU's top priority is, and always will be, safety and the protection of workers and the public through strong regulatory oversight. In this case, the request before the Commission is explicitly framed as being contingent on maintaining safety margins: Bruce Power's materials describe the requested operating levels as proceeding after demonstrating safety margins are maintained at these levels, and the formal submission describes a structured approach to demonstrating safety margins for the proposed intermediate power levels.

For Ontario to maintain reliability and meet fast-growing electricity demand while protecting its clean-electricity advantage, the province will need both new supply and the near-term optimization of existing clean baseload resources. The PWU supports Bruce Power's request to amend the licensing basis to increase reactor power limits at Bruce A and Bruce B, as part of Project 2030 targeting 7,000 MW site capability by the early 2030s, subject to the CNSC's determination that safety margins and all regulatory requirements are met.

Thank you,



Andrew Clunis
President
Power Workers' Union

List of PWU Employers

Alectra Utilities (formerly PowerStream)
Algoma Power
Aptum (formerly Cogeco Peer 1)
Atlantic Power Corporation - Calstock Power Plant
Atlantic Power Corporation - Kapuskasing Power Plant
Atlantic Power Corporation - Nipigon Power Plant
Atura - Brighton Beach Power
Atura – Halton Hills Generating Station
Atura – Napanee Generating Station
Atura - Portlands Energy
Bracebridge Generation
Brant County Municipality
Brookfield Power Wind Operations
Bruce Power Inc.
Canadian Nuclear Laboratories (AECL Chalk River)
Capital Power East Windsor
Capital Power Goreway
CC Nuclear (formerly Abraflex)
Centre Wellington Hydro
Compass Group (Bruce, Darlington, Pickering, PLC/Brock Rd.)
Cornwall Electric
Elexicon (formerly Whitby Hydro)
Enova (formerly Kitchener-Wilmot & Waterloo North)
Enwave Windsor
EPCOR Darlington Demineralized Water Plant
EPCOR Electricity Distribution Inc.
ERTH Power Corporation (formerly Erie Thames Powerlines)
ERTH Holdings Inc.
Electrical Safety Authority
eStructure
Ethos Energy Ltd.
Great Lakes Power (Generation)
Greater Sudbury Hydro
Greenfield South Power Corporation
Grimsby Power Incorporated
Halton Hills Hydro Inc.
Hydro One Inc.
Hydro One CSO (formerly Inergi)
Independent Electricity System Operator
InnPower (Innisfil Hydro Distribution Systems Limited)
Kinectrics Inc.
Lakeland Power Distribution
Laurentis Energy Partners
London Hydro Corporation
Milton Hydro Distribution Inc.
Mississagi Power Trust
NAES
Newmarket Tay Power Distribution
North Bay Hydro
Northern Ontario Wires
Nuclear Waste Management Organization
Ontario Power Generation Inc.
Orangeville Hydro
PUC Services
Quality Tree Service
Reworld Durham York Limited Partnership (Formerly Covanta Durham York Renewable Energy)

Rogers Communications (Kincardine Cable TV Ltd.)
Sioux Lookout Hydro Inc.
SouthWestern Energy
Synergy North (formerly Kenora Hydro Electric Corporation Ltd.)
The Town of Tillsonburg
Toronto Hydro
TransAlta Generation Partnership O.H.S.C.
Westario Power