

February 27, 2026

Public Safety Canada
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Submitted via email: EMEngagement-EngagementsGU@ps-sp.gc.ca

Subject: Electricity Canada Comments to the Consultation on Strengthening Federal Leadership in Emergency Management

On behalf of Electricity Canada and our members, I would like to thank Public Safety Canada for the opportunity to provide feedback on strengthening federal leadership in emergency management.

Founded in 1891, Electricity Canada (formerly the Canadian Electricity Association) is the national forum and voice of the evolving and innovative electricity business in Canada. The Association supports, through its advocacy efforts, the regional, national, and international success of its members. Electricity Canada members generate, transmit, and distribute electrical energy to industrial, commercial, residential, and institutional customers across Canada. Members include integrated electric utilities, independent power producers, transmission and distribution companies, power marketers, and system operators, who together deliver electricity to all Canadians, in every province and territory.

Our members manage vast, linear infrastructure and are increasingly on the front lines of severe natural hazards, including wildfires, floods, hurricanes, and ice storms, as well as evolving cyber and supply chain risks. Navigating this environment requires mature incident management and business continuity capabilities, supported by coordination with all levels of government, including the federal government.

Electricity Canada is proactive in building this resilience. We facilitate ongoing industry-wide discussions through our various councils and committees and manage mutual assistance programs, such as the Canadian Mutual Assistance Group (CanMAG) and, at a regional level, the Ontario Mutual Assistance Group (OnMAG).

We're also implementing a national playbook in partnership with government for executive coordination and information sharing, ensuring that industry and government leadership remain connected and informed during incidents of national significance.





Our comments and recommendations below were drafted based on input received by emergency management, business continuity and security professionals from within our membership, as well as members of the IESO's Lighthouse program. They are intended to help refine Canada's emergency management framework, increase collective readiness, and ensure that Canadians have access to critical services like electricity during challenging times.

1. Federal Leadership

Enhancing Visibility and Clarity

Under the *Emergency Management Act*, the federal government is mandated to exercise leadership through coordination. However, from the perspective of electricity providers, this leadership role, including *when* the federal government would assume a leadership role, is not always clearly understood and further clarity would be helpful. During steady-state planning, it is unclear under what circumstances an emergency would be defined as national, and how federal authorities would interface with the sector during such an event.

Recommendations:

- **Publicize Departmental Plans:** We recommend that federal departments make their emergency management plans accessible to relevant incident management communities within critical infrastructure sectors. Knowing how the federal government intends to respond to critical infrastructure disruptions allows utilities to better prepare.
- **Clarify the "Federal Concern" Trigger:** The Act allows the federal government to declare a provincial emergency to be of federal concern. The criteria and decision-making process for this declaration remain opaque. We would welcome a clearer understanding of the federal triggers for emergency management escalation, as this would improve predictability and help us better align our efforts and prepare effectively in partnership with the sector and other levels of government. Improvements to this approach could include establishing defined triggers that would enable industry to escalate certain emergencies to the federal government when appropriate.





2. Partnerships and Coordination

Direct Federal-Industry Coordination

A significant gap exists in knowing how and when the electricity sector should engage with the federal government. The current process, where support is generally triggered only after a provincial request, lacks visibility for critical infrastructure operators.

We recognize that provincial coordination is foundational to Canada's emergency management approach, and that during provincial emergencies, provincial emergency operations centres are often activated, with electricity companies occasionally either participating directly or being represented by a coordinator. However, some scenarios and systemic risks require earlier or more direct federal engagement with our sector, and at a pace much faster than is currently employed. While the federal government coordinates with stakeholders such as provincial and local governments, they should also work with critical infrastructure operators like electricity providers and system operators on incident mitigation, preparedness, response and recovery efforts relevant to those scenarios and systemic risks.

With further clarity on the points above, Electricity Canada can provide support by facilitating this type of engagement. Notably, in an effort to address some of these gaps, Electricity Canada is currently implementing a response Playbook for the electricity sector, co-developed with government partners, to facilitate this kind of direct government-industry coordination.

Recommendations:

- **Clarify Coordination Protocols:** Develop guidelines for the electricity sector outlining how to interface with the Government Operations Centre (GOC), other federal resources, and the specific types of support available when provincial resources are exhausted.
- **Directly Engage with Industry:** For national-scale incidents, the federal government should engage directly with industry leaders and information sharing groups rather than routing all communications through provincial channels, which can cause delays and information loss. Engagement through a process described by a Playbook, such as Electricity Canada's playbook, is the preferred method.
- **Conduct Joint-Scenario Planning:** Efforts should be deployed to identify systemic risk scenarios and co-develop response playbooks. This ensures that federal leadership is a known quantity before an incident occurs. Early, routine engagement between federal





officials and established industry coordination forums during steady-state conditions is essential to ensuring roles, information flows, and expectations are well understood before a crisis occurs.

- **Recognize Industry Response Mechanisms:** Federal engagement that recognizes the complementary roles of, for example, Electricity Canada's Playbook, mutual assistance programs, and the IESO's Lighthouse program, and aligns situational awareness with active industry coordination, would enhance response effectiveness, reduce duplication, and improve outcomes during emergencies of national significance. *See Annex A for more on this.*

3. Enhancing Risk Awareness and Data Integration

The Federal Value-Add

The federal government is uniquely positioned to act as a national hub for risk data, a role that provinces lack the capacity to fulfill individually.

Recommendations:

- **Standardized and Aggregated National Data:** Strengthening collaboration and partnership on data collection and sharing would help all partners. The federal government could collect, aggregate, and share granular data on natural hazards. While some provinces have open-source data and is very valuable, that level of granularity is not available across the country. By working together to enhance and harmonize data sets – for example, through consistent municipality-level wildfire risk mapping – higher risk scenarios based on incoming weather patterns could be identified and critical infrastructure planners could better inform climate adaptation and grid-hardening investments. Similar observations apply to cyber and physical security threats, where there are opportunities to better aggregate high-level data to support risk-informed decision making. For example, this could include improvements in how supply chain and procurement-related risk information is collected, analyzed and disseminated.
- **Consistency Across Borders:** Federal leadership should promote consistent risk data and threat assessments across provincial borders, providing a "national lens" on threats that individual utilities cannot see in isolation.
- **Contextualized Threat and Risk Products:** Current federal products may help address specific threats. However, they often lack the contextual, cross-cutting data





needed to understand risks and inform more strategic, sector-wide decision making. By provided better context, the federal government can assist industry in better managing risks.

- **Revitalized Critical Infrastructure Gateway:** Revitalize and modernize CI Gateway as a central platform for practical tools and resources. Its functions were reduced during the COVID-19 pandemic, despite being valued by industry practitioners. A refreshed CI Gateway should provide accessible, up-to-date templates, planning tools, and exercise materials that reduce administrative burden and support efficient training and program development.
- **Supporting Resiliency Investments Decisions:** The federal should produce and share robust risk, hazard, and cost-benefit studies that utilities can use to justify resilience investments, support regulatory rate filings, and secure sustainable funding for prevention and incident management programs.
- **Sustained Resiliency Programs:** Public Safety Canada should maintain and expand federal programs such as the Regional Resilience Assessment Program and Resilience to Insider Risk. These initiatives should be well-resourced, operationally relevant, and regularly updated to align with evolving natural, physical, cyber, and interdependent infrastructure risks.

4. Concluding Comments

The electricity sector does not seek a shift in the jurisdictional balance of emergency management, nor the creation of new or parallel emergency management structures. Industry value lies in operational readiness and execution, while federal value lies in clarity of roles, transparency of decision-making, and access to national-level risk and situational data.

We seek a federal partner that provides the strategic information and operational transparency necessary to help our sector prepare for and manage emergencies.

In many respect, this can be achieved by revitalizing existing federal tools. The Critical Infrastructure Gateway, whose functions either significantly changed or stopped all together during the pandemic, was widely valued by industry practitioners and should be leveraged to deliver value more quickly.





Additionally, aligning federal leadership with established industry coordination mechanisms will strengthen collective response without duplicating or displacing systems that are already functioning effectively.

By focusing on clarifying its own role, developing clear coordination protocols with our sector and enhancing its data collection and aggregation capabilities, the federal government can provide maximum value without conflicting with provincial jurisdiction.

Regards,

A handwritten signature in black ink, appearing to read "Michael Powell".

Michael Powell
Vice-President of Government Relations
Electricity Canada





Annex A

Recognizing Industry Playbooks and Mutual Assistance Programs as National Response Capacity

Electricity Canada is developing and implementing a national playbook in partnership with government for executive coordination and information sharing, ensuring that industry and government leadership remain connected and informed during incidents of national significance.

The Ontario Mutual Assistance Group (OnMAG) functions as a standing, regional, operational response network that is activated regularly to coordinate crews, equipment, and expertise during major events.

The Canadian Mutual Assistance Group (CanMAG) complements this model by providing a national network of utilities that remain connected through a shared agreement and established points of contact, enabling rapid peer-to-peer coordination and support across provinces when events exceed regional capacity.

Together, these structures support incidents with regional and national implications, often mobilizing industry resources ahead of formal requests for assistance.

Federal engagement that recognizes the complementary roles of Electricity Canada's Playbook and mutual assistance programs, and aligns situational awareness with active industry coordination, would enhance response effectiveness, reduce duplication, and improve outcomes during emergencies of national significance.