ICTC CTIC

Responsibly Supporting Ontario's Data Centre Sector

The Information & Communications Technology Council's submission to the Government of Ontario's public consultation on developing an economic and strategic assessment framework for new data centres

September 12, 2026

About ICTC

The Information and Communications Technology Council (ICTC) is a national, neutral, not-for-profit centre of expertise whose mission is to strengthen Canada's digital advantage in the global economy. For more than 30 years, we have provided forward-looking research, practical policy advice, and innovative, industry-informed capacity development solutions for individuals, businesses, and the public sector. Comprised of a national team of experts from coast to coast, our goal is to ensure that technology is used to drive economic growth and innovation, and that Canada's workforce remains globally competitive.

Executive Summary

Data centres are no longer simply industrial facilities; they are foundational infrastructure that underpins artificial intelligence (AI), cloud computing, advanced research, digital services, cybersecurity, and economic competitiveness. As demand for AI and digital infrastructure accelerates globally, Ontario has a significant opportunity to strengthen its position as a leading destination for responsible, high-value data centre investment.

ICTC supports Ontario's three proposed assessment pillars. These pillars provide a strong foundation for evaluating data centre proposals. However, ICTC recommends that Ontario place greater emphasis on outcomes that extend beyond headline capital investment and construction spending. Data centre projects should be assessed according to their ability to generate lasting economic value through high-quality employment, domestic procurement, AI innovation, research commercialization, intellectual property development, technology adoption, and improved access to compute capacity for Canadian businesses, researchers, and public institutions.

To that end, ICTC recommends that Ontario adopt a holistic approach that evaluates new data centre proposals based on an **Economic and Strategic Value per Megawatt Score**. Not all data centres contribute equally to Ontario's economy. Some large facilities may consume substantial amounts of electricity while generating relatively limited long-term economic activity. Conversely, projects that support Canadian AI development, sovereign compute capacity, research institutions, domestic supply chains, and local innovation ecosystems may produce significantly greater benefits for Ontario despite smaller electricity allocations. This score would assess proposals based on the measurable economic, strategic, and social benefits for Ontario per megawatt of electrical capacity required, thereby enabling Ontario to prioritize projects that deliver the most impactful returns for Ontarians relative to electricity demand.

ICTC further recommends that project proponents be required to report measurable indicators such as permanent employment, workforce development commitments, domestic procurement, tax revenues, compute availability for Canadian users, Indigenous participation, and local economic impacts. These metrics should be monitored over time through transparent reporting and accountability mechanisms.

Finally, Ontario's framework should recognize that data centres are fundamentally dependent on skilled talent. ICTC's labour market analysis demonstrates that data centre operations require highly educated and experienced workers across technical, operational, cybersecurity, facilities management, and support functions. As data centre investment accelerates, workforce

development planning must become a core component of Ontario's strategy to ensure an adequate supply of talent and to create pathways into high-quality jobs for Ontarians.

By adopting an assessment framework that prioritizes economic value creation, digital sovereignty, workforce development, Indigenous participation, and community benefits alongside responsible resource use, Ontario can attract high-value data centre investment while ensuring that limited electricity capacity delivers the greatest possible benefit to Ontarians and strengthens Canada's long-term digital competitiveness.

Background and Context

Data centres are critical infrastructure and must be treated as such.

Data centres, both high-performance artificial intelligence (AI) compute and traditional data centres, are the physical backbone of Ontario's increasingly digital and AI-enabled economy. Data centres provide the essential computing capacity required to train and deploy advanced AI models, deliver cloud services, protect and process sensitive data, support scientific research, and operate essential services across sectors from healthcare to finance to energy to public services.

Given their critical role at the centre of many technological, social, and economic processes, data centres should be treated as enabling economic and strategic infrastructure rather than primarily as large industrial electricity and water consumers and users. Rather, reconceiving data centres as comparable in importance to energy generation, telecommunications, and transportation systems—critical infrastructure systems that undergird most of Ontario's industry and economy—will enable Ontario to develop strategies and frameworks that are appropriate, measured, and adapted to the needs of both industry and communities.

Demand for data centre infrastructure is accelerating, due in part to the rapid expansion of AI, machine learning, and cloud computing. The International Energy Agency projects that electricity demand from data centres globally will more than double by 2030 to approximately 945 terawatt-hours.[1] Expected growth in AI usage and demand is expected to be a large driver of this increased electricity demand, with energy use directly attributable to AI data centres expected to increase fourfold.

As a major global and national hub for AI research, development, and innovation, Ontario is already experiencing these pressures: proposed data centre connection requests collectively exceed 10,000 MW, compared with the province's recent peak electricity demand of approximately 25,000 MW.[2] While the number of proposed connections does not necessarily correspond to the number of new data centre builds, the scale of the demand demonstrates the need for deliberate, transparent, and long-term infrastructure planning that responds not only to current needs but also contributes to the reshaping of Ontario's economic and technological future.

ICTC's forthcoming report on the workforce demands from Alberta's AI data centre strategy yields valuable insights for Ontario's future needs. Data centre development can generate benefits across

[1] Laura Cozzi, et al., "Energy and AI," International Energy Agency, April 10, 2025, https://www.iea.org/reports/energy-and-ai.
[2] See: Government of Ontario, "Economic and Strategic Assessment Framework for New Data Centres," August 2026, https://ero.ontario.ca/notice/026-0853.

an extensive economic value chain. Upstream benefits include increased industrial construction activity, with associated demand for high-paying, high-value occupations including engineering, skilled trades, electricity and water infrastructure, cooling systems, servers, semiconductors, and networking equipment.

Downstream, domestic data centre capacity provides reliable, secure, and low-latency access to powerful computing capacity, enabling further AI research, innovation, commercialization, and adoption. Additionally, access to compute can support data-intensive public services and may strengthen domestic control over commercially sensitive personal, non-personal, and public sector data. As ICTC's forthcoming research on Alberta's AI data centre workforce examines, the greatest economic value is likely to arise when data centres are integrated into regional innovation, energy, workforce, and industrial development strategies—not when they operate as isolated infrastructure assets.

Ontario is an AI research powerhouse competing in a rapidly intensifying global investment environment.

Canada has recognized the strategic importance of compute through its Sovereign AI Compute Strategy, which committed up to $2 billion, including up to $700 million to leverage investment in new or expanded Canadian AI data centres, $1 billion for public computing infrastructure and $300 million to improve compute access for Canadian firms.[3]

In the United States, the Stargate initiative—a public-private collaboration between SoftBank, OpenAI, Oracle, MGX, Microsoft, NVIDIA, and Arm—announced an intention to invest US$500 billion over four years in AI infrastructure, while the federal government has prioritized accelerated permitting and financial support for large data centre and related infrastructure projects.[4]

Across the Atlantic, the European Union is mobilizing €20 billion for AI Gigafactories as part of a broader strategy to expand computing capacity, strengthen industrial competitiveness and advance technological sovereignty.[5] Closer to home, Alberta's 2024 AI data centre strategy seeks to attract $100 billion in data centre investments, leveraging the province's competitive advantages in power capacity and energy access, cooling, and market and regulatory competitiveness.[6]

These commitments illustrate the intensity of global competition for investment capital, computing capacity, energy, talent and the economic activity enabled by AI infrastructure. Without a competitive and coordinated approach, Ontario risks seeing its AI innovations, firms and intellectual property migrate to jurisdictions where compute is more readily available.

---

[3] Innovation, Science and Economic Development Canada (Government of Canada), "Canadian Sovereign AI Compute Strategy," June 4, 2026, https://ised-isde.canada.ca/site/ised/en/canadian-sovereign-ai-compute-strategy.
[4] OpenAI, "Announcing The Stargate Project," January 21, 2025, https://openai.com/index/announcing-the-stargate-project/; Federal Register (United States), U.S. President, Executive Order 14318, "Accelerating Federal Permitting of Data Center Infrastructure," July 28, 2025, https://www.whitehouse.gov/wp-content/uploads/2025/07/eo-14318.pdf.
[5] See: European Commission, AI Gigafactories, accessed September 9, 2026, https://commission.europa.eu/topics/competitiveness/competitiveness-coordination-tool-projects/ai-gigafactories_en.
[6] See: Government of Alberta, "Artificial Intelligence Data Centres Strategy," accessed September 9, 2026, https://www.alberta.ca/artificial-intelligence-data-centres-strategy; Peter Mitham, "Alberta eyes data centre dominance with five-year investment target," Western Investor, July 24, 2026, https://www.westerninvestor.com/british-columbia/alberta-eyes-data-centre-dominance-with-five-year-investment-target-12585548; Jack Farrell, "Alberta tech minister wants $100B in AI data centre infrastructure built over next 5 years," CBC News, December 4, 2024, https://www.cbc.ca/news/canada/edmonton/alberta-ai-data-centres-1.7401602.

Data centre investments must be made with public confidence.

Ontario is well-positioned to attract high-value, responsible data centre investments. Ontario's robust energy system, anchored by nuclear and hydroelectric generation, offers access to reliable and comparatively clean power. Ontario also benefits from a cool climate, available industrial land, strong telecommunications connectivity, and an agile and talented workforce with expertise in energy, engineering, construction, AI, and advanced technologies.

Furthermore, Ontario is a globally recognized AI and innovation ecosystem, combining leading research institutions like the Vector Institute, world-renowned universities and colleges, deep pools of technology talent, established technology companies and a growing base of AI ventures. A report from the Vector Institute show that Ontario-based AI companies attracted $2.6 billion in private investment in 2024–25, while 17,196 AI jobs were created and 70 new AI companies were established in the province.[7]

Expanding domestic compute capacity would help convert Ontario's research and talent advantages into commercialization, productivity growth, intellectual property development and globally competitive firms.

Operating Ontario's data centre infrastructure requires a highly skilled workforce.

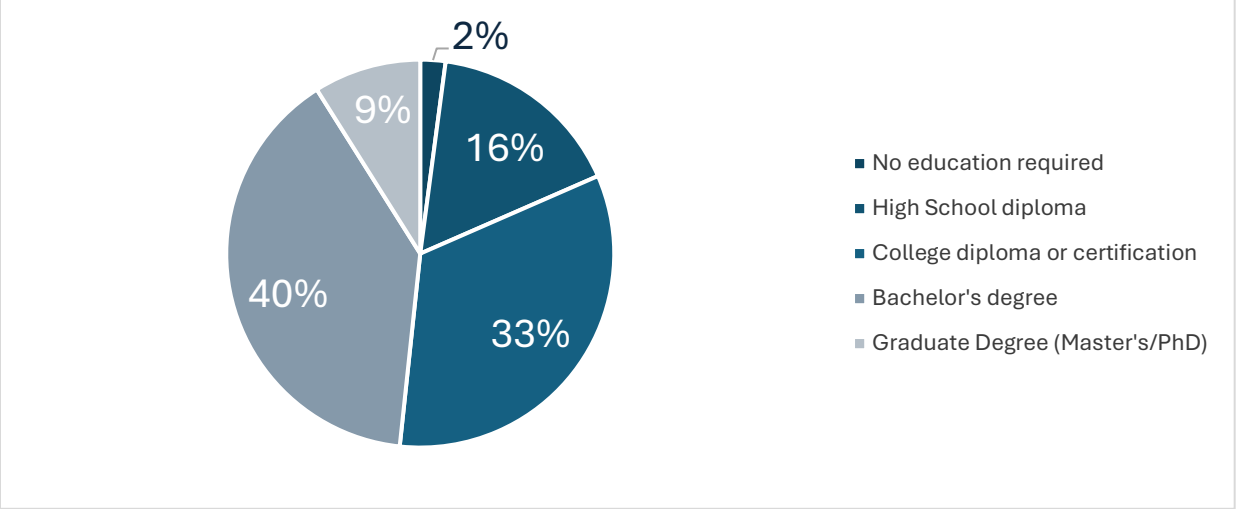
Like reliable electricity, talent is a critical input for data centre development in Ontario. Data from ICTC demonstrates that operating data centres in Ontario requires trained and experienced staff. Operational data centre staff work within a data centre keep the data centre operating safely and at a high reliability; consisting of technical specialists in IT and network operations, data centre physical infrastructure and facilities management professionals, and security and risk management. Data centres also require a complement of supporting staff, in roles such as finance, HR and administration, and customer service.

ICTC's analysis of over 4,800 data centre job postings by 74 companies operating data centre infrastructure throughout Canada, collected by ICTC between January 2022 and April 2026, demonstrates the need for a trained and experienced workforce to operate data centres in Ontario.

ICTC's job posting analysis finds that Ontario data employers seek an educated workforce, with 40% of job postings requiring a bachelor's degree, 33% a college diploma or certification, and 9% a graduate degree. Sixteen percent of job postings required a high school diploma, while only 2% stated no formal education requirement (Figure 1).

[7] Vector Institute, "Ontario's AI ecosystem: fueling real economic growth with record number of jobs and private investments," June 18, 2025, https://vectorinstitute.ai/ontario-ai-ecosystem-report-2024-25/.

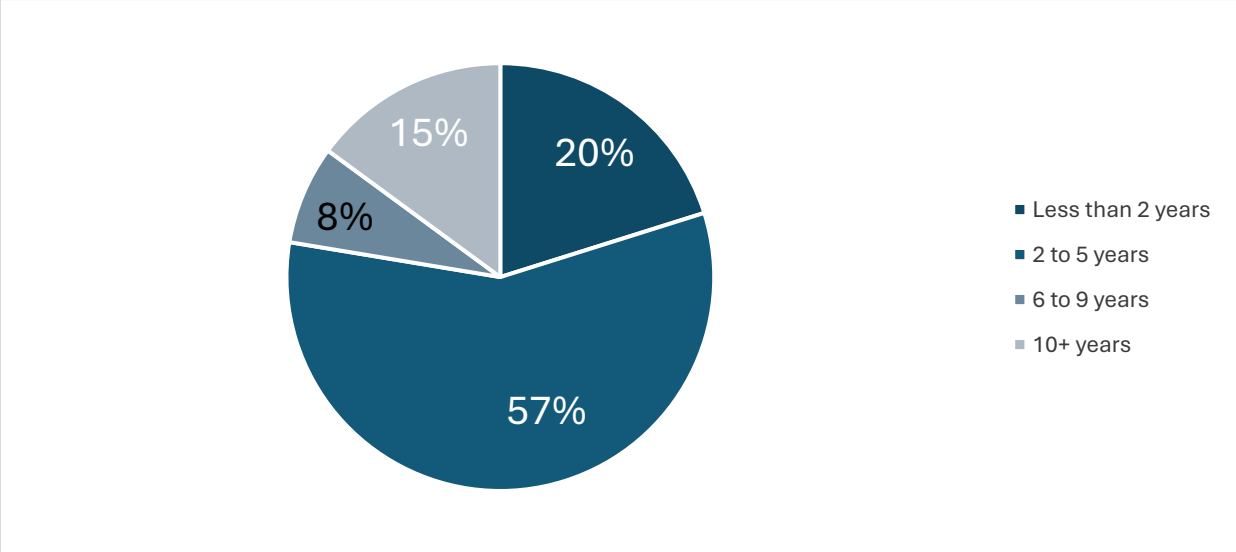
Figure 1. Requisite Education – Ontario Data Centre Operator Job Postings



Source: ICTC's custom list of Canada-based data centre operators; Vicinity Jobs, ICTC Analysis. Job posting data collected between January 1, 2022, and April 30, 2026.

Data centre employers in Ontario also require an experienced data centre workforce, with 59% of job postings ICTC analyzed requiring two to five years of experience, while 15% required ten or more years of experience. Only 18% of job postings required less than two years of experience (Figure 2).

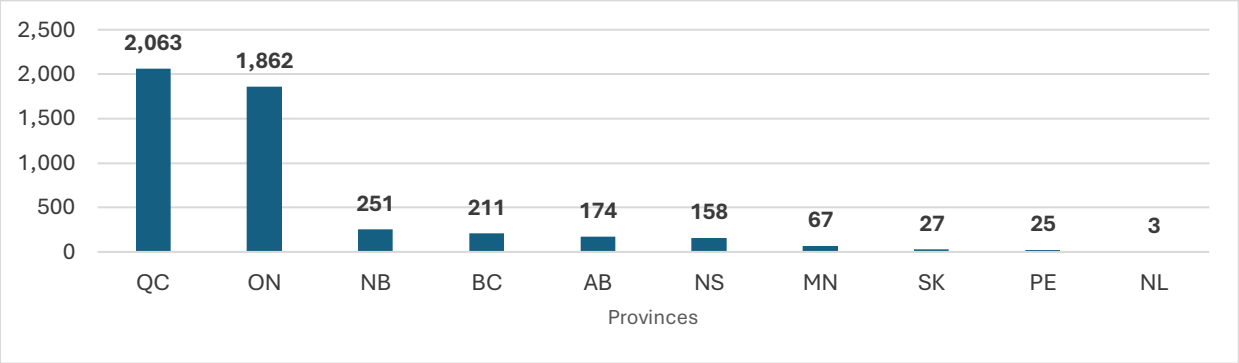
Figure 2. Required Years of Experience – Ontario Data Centre Operator Job Postings



Source: ICTC's custom list of Canada-based data centre operators; Vicinity Jobs, ICTC Analysis. Job posting data collected between January 1, 2022, and April 30, 2026.

To date, alongside Quebec, Ontario has been focal point for data centre employment in Canada, with the province accounting for 38.5% of job postings collected by ICTC (Figure 3).

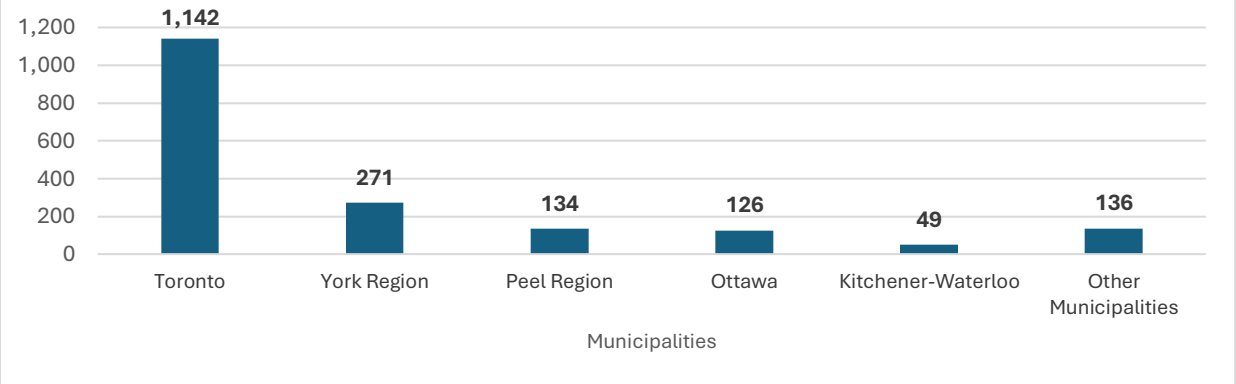
Figure 3. Canadian Data Centre Operator Job Postings by Province



Data Source: ICTC's custom list of Canada-based data centre operators; Vicinity Jobs. ICTC Analysis. Job posting data collected between January 1, 2022, and April 30, 2026.

ICTC's job posting analysis suggests that data centre hiring has been concentrated in the GTA, with Toronto (61%), Markham (15%), and Peel Region (7%) being the top employment markets for data centre hiring, together accounting for 83% of job postings analyzed (Figure 4).

Figure 4. Ontario Data Centre Operator Job Postings by Municipality



Data Source: ICTC's custom list of Canada-based data centre operators; Vicinity Jobs. ICTC Analysis. Job posting data collected between January 1, 2022, and April 30, 2026.

If large numbers of large data centres are built and operated in Ontario in the coming years, it may produce a labour crunch of trained and experienced data centre operators in the province. A 2026 analysis Alberta's AI data centre workforce by ICTC finds that high data centre development scenarios in that province will produce acute workforce shortages for data centre operational staff in the next 10 years, as well as pressure on the province's construction and skilled trades workforce.[8]

As more and more large data centres are proposed and developed in Ontario, it is critical to monitor workforce trends throughout the province and identify emerging talent gaps, changing regional employment dynamics, and workforce development and training intervention opportunities.

[8] See: Information and Communications Technology Council, "Alberta's AI Data Centre Workforce: Skills, Talent, and Economic Opportunity," Forthcoming: October 2026.

Empowering communities to contribute to Ontario's long-term data centre strategy.

While the benefits are substantial, they do not eliminate legitimate community and environmental concerns. Large data centres can impose substantial and highly concentrated demands on strained electricity systems, water resources, municipal infrastructure, and land. Communities may also experience concerns regarding noise, backup generation, environmental impacts, construction disruption, limited permanent employment and the distribution of project costs and benefits.

Ontario's framework should therefore prioritize projects that provide demonstrable provincial and local value while requiring credible plans for energy and water efficiency, cost responsibility, environmental performance, community engagement and local benefit-sharing. A transparent, evidence-based assessment process can reconcile Ontario's strategic need for AI infrastructure with the equally important need to protect ratepayers, host communities and the province's long-term energy security.

ICTC's Response to the Government of Ontario's Questions

I. What are your thoughts on the pillars that are meant to capture how Ontario should assess the economic and strategic value of data centre proposals?

At a strategic level, the three pillars identified in Ontario's August 2026 *Data Centre Playbook*—(1) advancing economic development in the province, (2) protecting Ontario and Canada's data security and digital sovereignty, and (3) investing in communities to earn and maintain the public's confidence—provide an appropriate framework to help Ontario understand the economic and strategic value of individual data centre proposals.

The proposed pillars are also congruent with the federal government's recently published *Canada's Responsible Data Centre Development Principles*, regarding local benefits; transparency regarding local impacts, including electricity costs, water use, and other environmental impacts; and the need to bring strategic value to Canada.[9]

Data centre infrastructure is essential to advancing Ontario's and Canada's digital advantage in a global economy; attracting both domestic and foreign data centre investments to Ontario is critical to deriving maximum benefits from advanced digital technologies such as AI, machine learning, and cloud computing. Critical digital infrastructure, including large data centres, are foundational for supporting Canada's economic growth, innovation ecosystem, national sovereignty and security, and future workforce.[10]

Pillar 1 - Advance Economic Development

This pillar should not focus on topline capital investment alone, but should include other crucial elements needed to understand the broader economic benefits of data centres. These include increased access to high-performance computing for Canadian startups and researchers,

[9] See: Government of Canada, "Canada's Responsible Data Centre Development Principles," last updated September 3, 2026, https://ised-isde.canada.ca/site/ised/en/canadas-responsible-data-centre-development-principles.
[10] See: Namir Anani and Erik Henningsmoen, "A Roadmap for Canada's Digital Economy to 2030," Information and Communications Technology Council (ICTC), April 2025, https://ictc-ctic.ca/reports/a-roadmap-for-canadas-digital-economy-to-2030, 12.

technology commercialization, improvements in economic productivity, intellectual property creation and retention, and participation by domestic suppliers in data centre supply chains. Benefits should accrue to Ontario during both the construction and operational phases of data centre development.

The province should also work with the data centre industry to seek opportunities for Ontario entrepreneurs and innovators to develop key data centre technologies and inputs, such as networking and data processing, data centre cooling solutions, as well as advancing energy efficiency and sustainability across the data centre industry. Investing in the development of Ontario-based data centre technologies can also support export development and market diversification opportunities in global markets.

Pillar 2 - Protect Data Security and Digital Sovereignty

Domestically located and secure, sovereign AI compute is a strategic necessity for both Ontario and Canada's future economic growth, national security, technological sovereignty, and protection from foreign threats. The advanced compute capacity provided by large data centres located on Canadian soil provides freedom of action during international crises and economic shocks. Protecting critical data and enhancing Canada's cybersecurity posture are key considerations when considering data security and digital sovereignty.

Pillar 3 - Invest in Communities and Earn Public Trust

Large data centre investments in Ontario should bring tangible and guaranteed benefits to host communities, including support for employment, workforce development, and training opportunities for local workers; procurement opportunities for local businesses; stronger innovation ecosystems; and other community-level investments. Investments should demonstrate measurable outcomes for host communities.

Furthermore, Ontario should adopt an Economic and Strategic Value per Megawatt (MW) Assessment Framework when evaluating new data centre projects. While capital investment and construction expenditures remain important considerations, they should not be the primary determinants of project merit. Instead, the Province should assess the extent to which each MW of electrical capacity allocated to a data centre generates measurable economic, strategic, and societal benefits for Ontario and host communities. This approach would allow Ontario to measure and compare the relative value of data centre proposals against the amount of electricity consumed and prioritize projects that demonstrate the highest return-per-megawatt.

Likewise, as rights holders, Indigenous communities must be engaged early on through meaningful and substantive engagement and consultation to ensure new data centre projects yield measurable and transformational workforce development and training pathways for Indigenous workers, project procurement opportunities for Indigenous-owned enterprises, businesses, and entrepreneurs. Data centre development should help advance the economic sovereignty of Indigenous communities in Ontario.

The framework, including the three pillars, presented in Ontario's Data Centre Playbook, should evaluate how future large data centre projects interplay across the three pillars, reinforcing individual pillars while advancing Ontario and Canada's economic, technical, and societal interests. The framework should be revisited periodically to ensure it continues to reflect the needs of

Ontarians when it comes to obtaining maximum benefit from data centre development in the province.

II. How can data centres demonstrate alignment with each of the proposed pillars?

Future large data centre projects in Ontario could demonstrate alignment with the province's proposed pillars in the following ways:

Pillar 1 - Advance Economic Development

To ensure Ontarians derive maximum economic benefit from large data centre projects, both during both construction and operations, Ontario could assess whether project proposals encapsulate the following:

- Commit a defined share of computing capacity to Ontario startups, SMEs, research, and innovators and/or provide a dedicated compute access program for these groups to support AI research, development, innovation, and commercialization.[11] This will enable Ontario firms to benefit from data centre construction by creating an enabling environment to support AI innovation and research as well as application-layer development.
- Establish measurable commitments for permanent, high-quality data centre employment, apprenticeships and work experience opportunities; alongside skills development programming and the recruitment and retention of specialized AI, high-performance computing, and cybersecurity talent in Ontario. This should include commitments to support Indigenous and underserved communities in the province. Requiring workforce development commitments and co-investments can ensure that the benefits of data centre infrastructure are distributed widely to host communities.
- Require proponents to disclose and quantify metrics such as permanent full-time jobs created per MW of capacity; Ontario and Canadian procurement spending per MW; estimated provincial and municipal tax revenues generated per MW; research and development activity conducted in Ontario; intellectual property development and commercialization occurring in Ontario; compute capacity made available to Canadian businesses, researchers, and public institutions; growth in domestic AI, digital infrastructure, and innovation ecosystems; and broader economic value generated through local supply chains and downstream industries.
- Develop partnerships with Ontario post-secondary institutions, research facilities, innovation hubs and incubators, and technology transfer organizations to support R&D, commercialization, and to retain Canadian ownership of resulting intellectual property.
- Submit a domestic procurement and supply chain plan covering Ontario or Canadian suppliers where feasible, including critical technological inputs such as semiconductors, photonic interconnects networking hardware, and cooling and power systems, construction, maintenance, and related services.

[11] Namir Anani and Erik Henningsmoen, "A Roadmap for Canada's Digital Economy to 2030," Information and Communications Technology Council (ICTC), April 2025, https://ictc-ctic.ca/reports/a-roadmap-for-canadas-digital-economy-to-2030.

- Demonstrate how large data centre projects will support technology innovation, adoption and productivity in strategic sectors such as advanced manufacturing, energy, agriculture, healthcare, and life sciences.

Pillar 2 - Protect Data Security and Digital Sovereignty

To ensure that large data centre projects protect Ontarians' and Canadians' personal and non-personal data and are secure from foreign interference or intervention, Ontario could assess whether project proposals encapsulate the following:

- Demonstrate that high-sensitivity and critical data will be stored, processed, and governed in Canada, with clear disclosure of ownership, operational control, subcontractors, and exposure to foreign jurisdictions.
- Maintain secure domestic compute capacity for critical and public interest uses, supported by appropriate cybersecurity, physical security, resilience, and threat-protection measures.
- Show how Canadian intellectual property and critical systems will be safeguarded, including research security and IP-retention arrangements.
- Provide a semiconductor and critical hardware resilience plan that identifies dependencies, chokepoints, geopolitical risks, trusted partners, and contingencies for supply disruptions.
- Demonstrate alignment with Canadian cybersecurity, privacy, transparency, and data governance standards, with special consideration for Indigenous data and digital sovereignty.
- Develop a robust risk monitoring and mitigation plan that governs how threats will be identified, assessed, and mitigated and propose transparency and disclosure procedures where sensitive data has been accessed inappropriately.

Pillar 3 - Invest in Communities and Earn Public Trust

Host communities must not only be consulted but also realize timely, tangible, and measurable benefits from large data centre construction. Data centre projects should be designed and conceived with the needs, priorities, and goals of the host community in mind, supporting local economic development, investment, and workforce development, encapsulating the following:

- Enter into measurable community benefit commitments covering local hiring, apprenticeships and work experience opportunities, training and reskilling, and pathways for women, Indigenous peoples, newcomers, persons with disabilities, and other underrepresented groups.
- Partner with educational institutions, workforce development providers, industry associations, and regional innovation hubs to build durable local talent and innovation pipelines in Ontario.
- Demonstrate early and ongoing community engagement, including transparent reporting on anticipated benefits, resource demands, and project performance.

- Submit quantified energy- and resource-efficiency plans, including electricity demand, peak-load management, water consumption, GHG emissions, and efficiency improvements.
- Establish plans for electronics reuse, recycling, and reintegration of valuable materials into supply chains.
- Demonstrate that the project will not compromise grid reliability or shift infrastructure costs onto communities, utilities, or other users; data centre project proponents should identify required generation, transmission, and efficiency measures as appropriate.

III. Is there anything that is missing or that should be emphasized within the pillars?

Ontario's three proposed pillars can be strengthened by incorporating the following policy considerations:

- **Provisions for access to advanced compute:** Pillar 1 on advancing economic development should explicitly measure whether Ontario startups, SMEs, researchers, and public-interest institutions will receive affordable and reliable access to computing capacity.
- **Commercialization and IP retention supports:** The framework and three pillars should distinguish between large data centre projects that strengthen domestic innovation and retain Canadian intellectual property from facilities that primarily provide passive hosting or foreign-controlled cloud and AI compute capacity.[12]
- **Information on supply chain resilience:** Assessments of new data centre in Ontario should cover dependencies on foreign semiconductors and other critical hardware, as well as contingency plans for geopolitical risks and trade disruptions.[13] This should be a core concern for Pillar 2 regarding protecting digital sovereignty. While domestic self-reliance of semiconductor technology, including GPUs and other AI accelerator chips, is not practical, it is crucial to understand the total scope of foreign dependencies for semiconductors and other critical hardware.
- **Broader environmental performance metrics:** The third pillar should extend beyond water-efficient cooling to encompass energy efficiency, grid capacity, emissions, heat, and circular management of electronic waste.
- **Requirements for inclusive participation:** Workforce assessments carried out under Pillar 1 and Pillar 3 should include measurable outcomes for Indigenous peoples and other underrepresented groups, including Indigenous-led training and culturally grounded, co-developed program design.
- **Regional economic development provisions:** The framework should assess whether projects strengthen regional innovation ecosystems and respond to local economic needs, including those of rural and underserved communities.

---

[12] Information and Communications Technology Council (ICTC), "Seven Key Recommendations for Canada's Renewed National AI Strategy," October 31, 2025, https://ictc-ctic.ca/reports/seven-key-recommendations-for-canadas-renewed-ai-strategy, 5-6.
[13] Canada's Semiconductor Council, CMC Microsystems, Information and Communications Technology Council (ICTC), and ventureLAB, "A National Semiconductor Strategy for Canada: Policy Options and Recommendations," Information and Communications Technology Council (ICTC), November 2025, https://ictc-ctic.ca/reports/a-national-semiconductor-strategy-for-canada, 36.

- **Transparent, outcome-based measurement:** The pillars should ask data centre developers to provide baselines, targets, timelines, and recurring public reporting for jobs, domestic procurement, compute access, training, energy and water use, emissions, and community benefits.

Furthermore, ICTC recommends that Ontario develop an **Economic and Strategic Value per Megawatt Score**. Project evaluation should move beyond the question of the absolute scale of the investment and instead consider how much economic and strategic value does Ontario receive for each MW of electricity committed to the project. This distinction is important because not all data centres contribute equally to Ontario's economy. Data centres vary significantly in their operational models, integration with local industries, workforce requirements, and contribution to innovation and economic development.

For example, some hyperscale facilities may represent substantial headline investments and require large allocations of electricity. However, following construction, these facilities can be highly automated and generate relatively limited permanent employment. In some cases, a significant portion of server equipment and specialized technology infrastructure may be imported, the computing resources may primarily serve international customers, and relatively little associated research, intellectual property development, or value-added economic activity may occur within Ontario.

Conversely, a smaller or similarly sized facility that supports domestic AI development, advanced computing services, research institutions, public sector applications, or Ontario-based enterprises may generate substantially greater economic activity, higher-value employment, stronger local procurement, and greater strategic benefits for the province despite requiring a comparable or even smaller electricity allocation.

Accordingly, Ontario should incorporate this score into its project assessment process and prioritize projects that demonstrate the highest return to the province in terms of jobs, innovation, domestic compute availability, tax generation, and long-term economic resilience. This would help ensure that electricity resources are directed toward projects that maximize economic development outcomes and strengthen Ontario's strategic position in the digital economy.

IV. Are there particular pillars that should be given more priority than others?

The pillars included in Ontario's Data Centre Playbook should be designed to be interdependent and self-reinforcing, while adopting an Economic and Strategic Value per Megawatt Score that allows Ontario to appropriately weight proponents and investments against economic and social returns. From this perspective, the pillars should be equally weighted.

Conclusion

Ontario's approach to data centre development will shape its ability to compete in an increasingly AI-driven global economy. Building on the province's three proposed assessment pillars, ICTC recommends a framework that connects electricity allocation to lasting economic and strategic

value. An **Economic and Strategic Value per Megawatt Score** would help Ontario prioritize projects that make the strongest contribution to high-quality employment, domestic supply chains, Canadian AI innovation, research commercialization, and sovereign compute capacity. This approach would recognize the differing contributions of data centre projects and direct limited electricity capacity toward investments that deliver the greatest benefits for Ontarians.

Realizing these benefits requires clear commitments, sustained workforce development, and accountability throughout each project's lifecycle. Measurable indicators and transparent reporting should track whether investments deliver on employment, domestic procurement, access to compute, Indigenous participation, and local economic benefits. Integrating workforce planning into project assessment would also help Ontario meet demand for specialized talent while creating pathways into high-quality careers. Together, these measures would position Ontario to attract responsible, high-value data centre investment, strengthen its innovation ecosystem, and advance Canada's long-term digital sovereignty and competitiveness.