

WCO | WIND CONCERNS ONTARIO

August 4, 2022

IESO Engagement

By email

Re: Feedback on Long-Term RFP

Please see the attached comment document, which may be made public.

Wind Concerns Ontario is a coalition of community groups, families and individuals concerned about the impact of grid-scale wind power development on the environment, economy, and human health. We have been working with communities since 2008, and are aware of many challenges and difficulties with the approval processes for wind power projects in Ontario.

It is not an exaggeration to say that procurement of wind power generation in Ontario has not been a success from the standpoint of people who are living in communities forced to “host” wind power developments. In the past, community consultation was non-existent. Municipalities were simply notified of proposals but by the time citizens learned of these power projects they were told it was a “done deal.”

Real problems with turbine locations (damage to aquifers, harm to wildlife, noise pollution, to name a few) were identified by communities but there was no mechanism in place to value these concerns or act on them.

It was the very definition of exclusion and inequality.

That cannot happen again.

Our comment document attached expresses our disappointment that little has changed, according to the proposed RFP process. Despite revocation of the Green Energy Act and a return of local land-use planning powers, in fact communities still have little control over or input to giant power projects.

An example currently is the City of Ottawa where a climate change action plan stipulates an incredible 3,200 megawatts of wind power (translated to 710 industrial-scale wind turbines), 20 megawatts of which are planned for 2025, yet there has been zero public engagement. This is unacceptable.

The recent announcement of a battery storage project in Prince Township is another example: community engagement was minimal, such that a local councillor expressed concern, according to a [news story](#). While meetings were held, they were not “well attended” according to the report. Rather

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than taking that as a sign of approval or the absence of objections, the IESO should properly be concerned about the lack of public awareness and involvement.

Thank you for the opportunity to provide feedback on this process.

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LONG TERM RFP ENGAGEMENT – FEEDBACK

August, 2022

The following document provides the feedback from Wind Concerns Ontario (WCO) on the IESO's proposals for the Long Term RFP to procure additional electrical generation capacity.

WCO and our coalition member community groups have had extensive experience in dealing with the previous engagement process used to locate wind turbine projects implemented as part of the Green Energy and Green Economy Act. We have also seen the impact of these projects on communities across rural Ontario — impacts that were either not discussed or were rejected as impossible as part of that community engagement process.

The following feedback comments apply these learnings to the current proposed process.

1. **Actual Municipal Engagement** – The **Roadmap for Municipalities** published on your website presents an idealized, high-level view of working with municipalities.
 - a. **Narrow Perspective** – The process seems to be targeted at communities that have specialized resources dedicated to following the IESO procurement processes. This approach will give the IESO a very biased view of municipal concerns about this process. If there is a real desire for broadly based input from many municipalities whose support is required for this process to be a success, the IESO — not power project proponents — would need to make presentations at municipal council meetings across the province. The Roadmap does not seem to suggest that this level of outreach has taken place or is planned. This suggests that the municipal input that you have received is limited and probably only from municipalities focused on energy planning. Staff in most **rural** municipalities, whose support for the program is likely needed for successful implementation of the Long Term RFP, are focused on day-to-day management of municipal affairs.
 - b. **Municipal Election** – The schedule outlined in the Roadmap **does not provide appropriate consideration for the municipal election taking place in October**. On November 15, a new Council takes office in each municipality and, given the initial organization work required; it is unlikely that significant reviews of IESO plans can take place until early 2023. That is at the very end of the IESO consultation process.

It is also not appropriate for either the IESO and/or a power project proponent to be engaging in community consultations during the municipal election period. These discussions could become a separate issue in the election created by the IESO which is not appropriate.

- a. **Urban vs. Rural Dynamic** – Previous government-approved renewable energy projects treated rural communities across Ontario as if they were vacant land available for exploitation to meet the energy needs of urban centres. These communities were forced to host power generation projects that urban communities were not willing to have within their communities. This cannot be repeated. The engagement process needs to be designed to overcome the resulting mistrust.
 - b. **Sequence in Engagement Process** – The community engagement process must be completed before a proposed project comes before the municipality for consideration so that the views of the community can be considered in this process.
 - c. **Scope of Support** – Municipalities should only be allowed to sponsor projects within their municipal boundaries. Use of land in another municipality to attain carbon reduction targets within the municipality is not appropriate. Any carbon reduction benefits of a project should be credited toward the carbon reduction goals of the host municipality.
 - d. **Response to Input** – Under the Green Energy Act process, municipalities were asked for their input based on a questionnaire on the project. Completion of this questionnaire was merely a box that needed to be ticked in the approval process, but there was no requirement to respond to input received in these questionnaires. This occurred even when municipalities communicated valuable information about the limitations of the sites that had been selected for elements of the project. The result has been situations where huge wind turbine towers were located on unstable Leda/marine clay and transformer stations built on sensitive ground water recharge areas, for example.
2. **Community Engagement** – The Roadmap makes no reference to a broader community engagement process. The bad experiences in rural Ontario as a result of a farcical community engagement process linked to renewable energy projects under the Green Energy and Green Economy Act have created a climate of distrust that will be a major barrier to moving forward with this initiative. Any community proposed as a host location for a project needs to be fully engaged separately from municipal consultation. A series of Zoom meetings are not going to achieve this objective. We see the following as key elements of an effective community engagement process:

- a. **Participation** While the proponent can lead community engagement sessions, the IESO should also be present at any local meetings.
 - b. **Public Notice** – there are rules for public notices for meeting dealing with municipal zoning changes including notice to adjacent landowners that will be affected by the project, notice of the meeting posted on roads adjacent to the location; and advertising in local media.
 - c. **Availability of Information** – Full details regarding the project should be posted online and available in printed form at convenient locations near the proposed site. If only preliminary information is available at the time of the public engagement session, a second one should be organized when the full information is available. Material changes to the proposal after the public meeting should trigger a requirement for a new public engagement meeting.
 - d. **Format** – The meeting should be in a town hall format with a sound system available that will allow everyone in attendance to hear questions and responses.
 - e. **Input for Municipality** – The IESO should be responsible for preparing a report on the meeting for the municipality that fully documents any concerns raised by attendees at the meeting along with the responses provided by the proponent.
 - f. **Response to Input** – Again, simply holding a public meeting is not sufficient to satisfy the requirements of the engagement process. The IESO must ensure that the proponent actually modifies the project to reflect the input received from the community.
 - g. **Divergent Views within Municipality** – Some large regional municipalities contain diverse urban and rural communities which may have divergent views on the project. This diversity of view may not be reflected in Council memberships which tend to be dominated by the urban communities due to the larger populations. Any decision to support a project needs to reflect the portion of the municipality that will actually be hosting the physical elements of the project. (An example of this is the City of Ottawa, where a climate change action plan stipulates 710 grid-scale wind turbines in the city’s rural areas; no public engagement has occurred, and many residents are completely unaware of the plans.) To ensure that these views are captured and reflected in the decision, the community engagement process needs to take place in sections of the municipality that would be hosting the proposed project, and any conflict in views between the municipal government and the community must be resolved in favour of the local community.
3. **Regulation 359/09** – There has been no comprehensive review of Regulation 359/09 since it was enacted in 2009. There has been substantial learning from the projects that

have been implemented in the interim and many studies of the impact of projects on the health of residents living nearby. Most critical are the setbacks from other activities and from property lines. At one point, Ontario claimed leadership in terms of setback requirements, but changes implemented in other jurisdictions now make Ontario a laggard in protecting residents from the adverse effects caused by these projects. Representatives of the government promised that these issues would be addressed but the focus on COVID and the provincial election delayed action on the review of setbacks. The issue of safe setbacks must be addressed before the IESO grants final approval to any new project. The new setbacks also need to apply to any modifications of existing projects.

- 4. Qualification Process** – The IESO has extensive experience with many of the companies applying for new projects; the track record of these companies in complying with the terms of the approvals for the existing projects should be considered in the qualification process. Companies with projects that are not operating in compliance with their approvals should not be considered as qualified applicants for new projects. For example, only 45 percent of wind turbine projects operating in Ontario today have met the requirement in their Renewable Energy Approval to submit noise audits that verify the project is operating within the 40 dBA noise limit. Most projects have not complied with approval requirements to promptly resolve resident complaints about adverse effects created by the project. While these non-compliance situations provide the IESO grounds to cancel the contracts with excessive rates for electricity produced, at a minimum this situation should mean these companies are disqualified from new contracts or from renegotiation of these contracts.
- 5. Link to Current Contract Commitments** – There also is a need to clarify how new proposals related to projects that are subject to existing IESO contracts will affect existing contract commitments. An example would be a proposal to add storage capabilities to leverage output from a wind turbine project whose output is already subject to an IESO contract. It would appear that proposals of this nature would require a renegotiation of the full contract, including “First to the Grid Rights” or “must take” requirements and premium rates for electricity generated. These new proposals should not be treated as add-ons to the existing contract, but opportunities to renegotiate the complete contract.
- 6. Accessibility/Use of Technical Terms** – Many of the presentations and documents used in the IESO engagement process include extensive use of terminology and short forms that may be familiar to experts in this specialized field, but which are not meaningful or accessible to the individuals that the IESO wants target in this engagement process. This fosters inequity in the process.

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