

Feedback on the draft LRP FIT 5 Rules, Contract, Standard Definitions and Prescribed Forms must be sent to FIT@ieso.ca by July 28, 2016. In accordance with IESO's engagement principles, all responses will be made available on the IESO's website.

Please identify the form name, section number, definition or appendix of the draft document that you are providing feedback on.

Submitter Information:

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AFTER DISCUSSIONS WITH THE MUNICIPALITY OF MIDDLESEX CENTRE, PLEASE SEE FEEDBACK ON PAGE 2 IN RESPECT OF THE DRAFT RULES FOR FIT 5.

Thank you.

Feedback Form: Draft FIT 5 Rules, Contract, Standard Definitions and Prescribed Forms

<p>FIT % Rules Section 5A et al.</p>	<p>We are a municipality and would like to register an objection to the draft FIT 5 rules which we see as heavily slanted in favour of private industry/investment community - to the detriment of non-partnering municipalities.</p> <p>We were dismayed to see competitive pricing introduced to FIT 4 in order to “level the playing field”. Predictably, the result was the dilution of the very support that priority points were designed for i.e. provide support for municipalities.</p> <p>In spite of this, we submitted applications to FIT 4 as the sole owner of projects, in the hope of creating much needed revenue for our rural community.</p> <p>We could not afford to bid-down the price to increase our priority points, nor could we afford the associated Application Security fees had we done so. The cost of these two elements were clearly prohibitive.</p> <p>All of which raises the question: how can a municipality which elects not to partner even compete anymore? They simply cannot.</p> <p>In fact, private industry with Bay St./Wall St. are now almost the exclusive beneficiaries of the point system, as it all but guarantees contracts to those with money to buy points, particularly when combined with CCSA status.</p> <p>Evidence of this lies in the published list of contracts, where very few contracts were awarded to municipalities unless they had an investment partner.</p> <p>Sadly, this appears to fly in the face of the underlying spirit of support that the Minister of Energy intended to provide for applicants with the least, in favour of those with the most.</p> <p>As such, we respectfully request that the following adjustments be made to the the FIT 5 rules for municipalities/aboriginals/public entities without partners, ie. 100% ownership.</p> <ol style="list-style-type: none"> 1. Award additional, separate priority points to non-partnering municipalities/aboriginals/public entities. 2. Reduce the cost of purchasing priority points for non-partnering municipalities/aboriginals/public entities. 3. Reduce the Application Security fee to \$5/kw for non-partnering municipalities/aboriginals/public entities. 4. Remove CCSA status for Communities of 50 members + . They do not need assistance as many of them are formed by millionaire investors which reside in two tier counties, thereby qualifying as a “Community”.
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