

Feedback Form

Energy Webinar for Communities #2 Municipal Feedback – January 17, 2024

Feedback Provided by:

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Date: February 5, 2024

To promote transparency, feedback submitted will be posted on this [engagement webpage](#) unless otherwise requested by the sender.

Following the Energy Webinar for Communities held on January 17, 2024, the Independent Electricity System Operator (IESO) is seeking feedback. A copy of the presentations as well as recordings of the sessions are available on the [engagement web page](#).

Please submit feedback to engagement@ieso.ca by February 7, 2024.

Transmitter Selection Framework

Topic	Feedback
How do you want to be involved in developing the Transmitter Selection Framework?	Yes
Would you want to participate in upcoming targeted sessions? If so please indicate topics of interest.	Yes
What additional input or feedback do you think the IESO should consider as it embarks on this initiative?	Integrate transmission projects with generation and storage projects, to minimize the amount and impact of new facilities on prime agricultural land. Publish the full estimated Ontario land requirement to implement all renewable projects and storage projects for the 5TW and follow-up plans. Consider the total Ontario energy profile published by the Canada Energy Regulator to see if the proposed doubling of the Ontario electrical generation is enough to eliminate oil and gas usage in Ontario. What is the plan if it doesn't?

Long-Term 2 Request for Proposals

Topic	Feedback
How do you want to be involved as part of the IESO's engagement on the procurement design?	Webinar updates. Written submissions.
How can the IESO streamline relevant processes (i.e., community engagement, municipal support) to the benefit of Proponents and municipalities?	Take municipal and community input seriously. Accept the municipality Official Plan process, and the Planning Act responsibilities of municipalities. Seriously review the setback criteria when repowering projects with high powered wind turbines.
Based on your experience in past IESO procurements, what feedback can you provide with respect to Municipal Support Resolutions, including around the removal of municipal rated criteria points?	Not feasible. I believe municipalities cannot give blanket project approval, for the reasons stated in the detail below. Questions during the webinars made it clear that this is a critical issue for municipalities.
What are some key considerations around the treatment of proposed projects in prime agricultural areas?	Non-agricultural areas only for solar, because of the sterilization of the land. Proponent proposals, including proposed contracts, payments, and agreements, to

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	landowners must be fully public, and include compensation for agricultural land damage at any point in the life of the project, with binding independent arbitration. Any inducements provided privately to anybody responsible for, or involved in, project approval, should be cause for project termination with prejudice.
How can the IESO better support municipalities to make decisions about proposed projects?	Update O Reg 359/09 to include guidance on BESS, pumped storage, repowering, and transmission projects. Present the full project impact. We live with them for 20+ years.

General Comments/Feedback

IESO, I appreciate the opportunity to attend your webinars on Jan 15 and 17 regarding municipalities and Indigenous communities impact of the IESO initiatives. I have several comments.

For many reasons, the proposal to implement municipality blanket approval before IESO approval is not practical. We have to understand that the primary consideration here is NOT certainty to the project proponent, as you stated. Rather it is mitigating impact to all the residents who will have to live with the project for potentially decades. We have to keep our priorities straight.

1) When submitted to the municipality for approval, the project details have to be complete enough for the municipality to fulfill its obligations under Regulation 359/09. Practically, this means the project design must show the exact location of all components and sufficient detail about them, with calculated noise levels, to assess their impact on the neighboring properties. I believe new regulations need to be implemented to assist municipalities in their consideration of BESS, solar, and transmission projects.

2) As stated during the webinar comments, municipal planners need considerable project detail in order to fulfill their obligations under the Planning Act. They need to determine whether the proposed use of a specific piece of property is consistent with the Official Plan, and if not what zoning amendments to make (if any) under the Planning Act public consultation process. The municipality has to understand clearly whether any decision on the proposed project is even subject to appeal to the Tribunal.

3) During this approval process, the municipality may well want to determine if the project as proposed will place an undue burden on the other taxpayers, such as specialized firefighting equipment and training for novel fires. It may well want to assess these burdens and levy a special tax rate or monetary security to cover them. Again, this needs considerable project detail, and the municipality is not wise to give a blanket approval.

4) For site plan control, the Planning Act section 41 requires a set of plans for the proposed construction showing its relationships with nearby structures to which the public has access. There may also be a need to provide access to the property and mitigate any adverse impact on traffic flow, the road surface, or neighbours' access. Again, this requires considerable project detail and significant potential cost to the municipality.

5) the municipal official plan may well have different criteria to locate project components, based on

later scientific evidence, than that preferred by the proponent. This plays out based on previous experience with renewables projects, which has not gone well in a number of cases. Experience in other jurisdictions, and at the MOECC, indicates that the existing regulatory setback of 550 metres is not adequate, particularly for the newer more powerful machines, and should be updated before more projects proceed. This leads to greater caution, and lesser reliance on proponent assurances. I feel that, unless an obvious error of fact comes up, the municipal official plan must stand supreme.

6) Much more clarity needs to be published on the rules regarding wind project rebuilds. I think they would have to be treated for regulatory purposes as a brand new project with increased setbacks, as the adverse impact of taller turbines could extend over a much larger distance than the older less-powerful machines. Project rebuilds including infill of previously unused locations would need to assess the impact on existing residences. If new residences were built within the setback distance of previously unused locations, would they freeze the location? These are all issues municipalities would have to deal with, and they won't want to give blanket approvals without a process to understand the impacts.

7) All the inducements presented by the project proponent have to be accepted and approved, then followed through for a considerable time by the municipality. If the IESO has final say on a project, there is a tremendous incentive to eliminate inducements, leaving the municipality and taxpayers with all the costs and lesser benefits. Additionally, any inducements provided privately, to any individual responsible for, or involved in, project approval, should be cause to terminate the project with prejudice.

8) All the processes above cost money and time. It is unfortunate that provincial assistance is not available to all. Alternately, site and project specific levies on proponents will cover at least part of the cost.

Yours sincerely, Doug Smith, WAIT-PW