

Feedback Form

LT2-RFP Joint Session, February 22, 2024

Feedback Provided by:

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Date: March 7, 2023

To promote transparency, feedback submitted will be posted on the LT RFP engagement webpage unless otherwise requested by the sender. If you wish to provide confidential feedback, please mark as "confidential".

Following the February 22, 2024, LT2-RFP joint engagement with Ministry of Municipal Affairs and Housing (MMAH) and Ontario Ministry of Agriculture, Food, and Rural Affairs (OMAFRA) webinar, the Independent Electricity System Operator (IESO) is seeking feedback on items discussed during the webinar. The webinar presentation and recording can be accessed from the LT RFP [engagement web page](#).

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

Topic	Feedback
<p>What are some considerations if certain technology types were limited, or restricted from being developed on Ontario's prime agricultural areas?</p>	<p>EDPR recommends that the IESO considers each technology and it's impacts separately when weighing the possibility of restricting development on prime agricultural lands as the impact is dependent on the technology. For example, wind turbines have a very small footprint and are highly compatible with existing farming practices. On average, only 1% or less of the total leased acreage is used for project infrastructure. The remaining ~99% can still be used by the landowners, for farming, grazing, and ranching.</p>
<p>Given the limited amount of specialty crop areas in the province, how would diverting or restricting energy projects from these areas impact your ability to develop your energy project?</p>	<p>No comment.</p>
<p>What would the impact be if there were requirements to avoid, minimize and mitigate agricultural impacts in prime agricultural areas?</p>	<p>A significant portion of renewable energy projects (specifically wind) are already operating in compatible ways with agriculture practices in these prime agricultural areas. These projects have likely been designed to not just minimize and mitigate impacts but to help improve the agricultural functions of the property. For example, farmers typically can use the project access roads to stage equipment for planting and harvest seasons.</p> <p>Continued eligibility restrictions in these areas will both impact the sustainability of the individual farm while also limiting the development of these projects in areas which will best support the electrical system need. This includes the location of project at further distances from the electricity demand needs which will inevitably cause higher costs.</p> <p>Overall, if avoidance, minimization, and mitigation requirements are put in place to an unreasonable degree, the pace of development will be slowed or potentially halted. This will leave the IESO with fewer options to meet their energy generation procurement targets at a time when supply shortfalls are on the horizon</p>

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Based on what you heard today, do you require additional clarity on agriculture land restrictions? Why or why not?	We would request that the government provide clear and precise direction as to which lands are not eligible for project development for the LT2 RFP and future procurements. This information is required immediately for developers to proactively investigate potential projects for participation in future procurements.

General Comments/Feedback

EDPR recommends that the IESO does not impose prime agricultural limitations for wind projects. This would create extreme siting limitations and harm the opportunity for many otherwise suitable project sites that can produce competitive bids for the IESO to consider. Wind projects have proven to be very compatible with existing land use practices, including farming. Landowners can farm only meters from the turbine base without disturbances. Wind generation projects can also provide a reliable, stable revenue stream to hedge against some of the uncertainties that come with farming. Landowners can use wind project revenues to maintain their farm or expand operations with new equipment, acquire more land, or further diversify their businesses. Wind generation projects also require access roads which farmers can utilize for their farming needs. The actual footprint of a turbine during the operational term does not have a significant impact on the farming viability of the property.

EDPR has an extensive history with farmers who host our turbines on their land, both in Ontario and Alberta, as well as in the US. We would be happy to facilitate conversations between the IESO and farmers who we've worked with on our projects to share their experiences and communicate the benefits of renewable technologies coexisting with traditional agricultural land use.