

Feedback Form

LT2 RFP: Joint Session IESO, MECP and MNR

Feedback Provided by:

Name: Eric Muller

Title: Director, Ontario

Organization: Canadian Renewable Energy Association (CanREA)

Date: Feb 23, 2024

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 9, 2024, engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the items discussed. The webinar presentation and recording can be accessed from the [LT RFP engagement web page](#).

Please submit feedback to engagement@ieso.ca by February 23, 2024.

Item

Feedback

Please provide any general feedback to the IESO on what considerations need to be reflected in the LT2 Report Back on the procurement timelines and design to ensure efficient alignment with the proposed MNRF and MECP processes.

Crown Land Access

Proponents will need timely access to sites, including Crown land, to begin pre-bid development work by March / April 2024. For example, wind developers must have access to collect at least 12 months of meteorological tower (met tower) data.

Met towers are temporary and very low impact uses of Crown land, especially when located using existing roads and trails and when tree clearing is minimized. Given the province's need for increased electricity supply and the minimal and temporary impact of these structures, MNRF should commit to expedited and time sensitive reviews of met tower applications. Extensive environmental studies and engagement with municipalities, stakeholders and Indigenous communities should not be required and would be better applied later to potential REA applications, rather than met tower applications.

The sector requires procedural clarity as soon as possible regarding a timely and consistent process for gaining access to Crown land for both pre-development site and resource assessment, as well as alignment with IESO led timelines and processes for LT2. MNRF will need to provide much more information to proponents in the immediate term to provide the sector with regulatory and technical clarity, and investment confidence to proceed with LT2 pre-development work.

More clarity is also needed regarding the status of past wind power applications for Crown land and whether these lands are available for new proponents.

MNRF's 2014 policy framework speaks to potential wind power, waterpower and bio-energy facilities on Crown land but does not indicate whether Crown land would also be available for other energy technologies such as solar power and battery energy storage systems. Further clarity is needed.

MNRF and IESO should immediately and collaboratively engage the sector in the review of the draft Crown Land Site Report and its role in the LT2 procurement process,

rather than releasing the document without the benefit of sector input. CanREA and its members are ready and willing to contribute expertise and offer value added advice to MNRF and IESO in this regard.

Existing Facility Extensions

CanREA supports the notion that existing facilities will be able to maintain their existing REA or ECA permits if they do not propose changes to their facility.

Contracts for existing facilities begin expiring as early as 2026. Advanced planning for procurements, contracting, permitting and construction requires near-term decisions on the future of these assets.

Repowering

CanREA members with existing facilities in Ontario are concerned that very few existing sites could meet updated REA standards. The requirement for existing facilities to meet updated acoustics standards will be a significant barrier to repowering. This could challenge the province's ability to leverage existing sites for low-cost power to meet future needs. If a path for resolution is not found, the IESO may not be able to rely on existing assets in the medium to long term.

Whereas electricity system planning assumes continued and even increased output from prospective repowered facilities, current permitting challenges may limit options for existing facilities. These barriers should be addressed to enable repowering and minimize net environmental impact.

Nearly all prospective repowered facilities will need to propose changes to their existing assets to keep them in operation for the 20-year term. More detailed information is needed from MECP regarding the threshold required for a proposed change to trigger an approvals amendment.

The LT2 RFP and subsequent procurements of electricity supply from non-emitting resources will draw heavily on MECP resources to support permitting processes. Permitting is a critical-path item for these projects to be

Item	Feedback
	built and historically resulted in contractual defaults and mass contract extensions. Given today's urgent need for this power, these projects must be assured they can build on time.
Please provide what additional details are needed to inform project siting, development, and timelines to ensure projects are in-service by 2030.	See comments above