

# Feedback Form

## LT2 RFP: Joint Session IESO, MECP and MNRF

Feedback Provided by:

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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](mailto:engagement@ieso.ca) by February 23, 2024.**

Item	Feedback
<p>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.</p>	<p><i>Two comments/questions during the Feb 9 webinar were raised regarding the regulations for repowered wind facilities.</i></p> <p><i>The first was exploring the possibility of an exemption from a noise assessment or noise audit for a repowered facility because the area around the facility had changed with new receptors and the project might not meet current regulations.</i></p> <p><i>The second comment/question was that a wind facility approved under ECA conditions (i.e. prior to 2010, and prior to the Green Energy Act) might be modelled as being within noise compliance, using the noise assessment protocols when the projects were first developed. (the protocol in use at that time was last updated in 2004) But the same repowered facility would measure out-of-compliance for noise, with the current noise audit protocol. The question was “Is there a plan to address this?”</i></p> <p><i>The MECP’s response to the questions raised was that the proponents should engage in direct conversations with MECP officials with specific information on projects under consideration.</i></p> <p><i>I believe the MECP should be more direct in dealing with questions such as these.</i></p> <p><i>A facility that has been repowered, with new equipment, is no longer the same facility as originally designed. The original contract would have expired or been superseded with a new contract. The onus is on the proponents and their consultants to design and implement a facility’s repowering that meets today’s current standards.</i></p>

Item	Feedback
	<p><i>The onus is on the MECP to ensure that any repowered wind projects, with replacement wind turbines and/or transformers, are designed, assessed and operated with the same requirements as new wind projects.</i></p> <ul style="list-style-type: none"><li><i>• ...continued below</i></li></ul>

Please provide what additional details are needed to inform project siting, development, and timelines to ensure projects are in-service by 2030.

*DOCUMENTATION, NOTIFICATION OR CONSULTATION REQUIREMENTS for major changes to energy projects is outlined in Chapter 10 of the MECP's document Making Changes to Renewable Energy Projects.*

*Major Project Design Change*

- Documentation: Modification(s) Document, and update all documents submitted as part of the original REA application and any new and/or additional documents required by the Director\**
- Notification to the public, municipalities and Aboriginal communities will likely be required*
- Additional public consultation will likely be required*

*Based on the above:*

*Proposals for repowering existing wind projects should be posted on the Ontario Environmental Registry, with all the updated support documentation; and with a 45 day public comment period, prior to a decision on approval.*

*Continued below...*

## General Comments/Feedback

### *CONTRACT EXTENSION, BRIDGING OR REPOWERING EXISTING ENERGY PROJECTS.*

*During the Feb 9 webinar, the IESO rep stated that contract extensions for energy projects are not being considered as part of the LT2 procurement process.*

*It would be more accurate to state that contract extensions would not be considered as part to the 5TWh of new procurement. As stated in their December 13 webinar presentation, the IESO is studying how to “employ bridging and extensions to contracts to facilitate the success of the Resource Adequacy Framework”*

*the MECP rep stated that the MECP is not involved in contract extensions.*

*In reply to both the IESO and MECP statements, I would point out that wind projects nearing end-of-contract that could be considered candidates for bridging or extension, are mostly older projects that were approved under the old ECA protocols.*

*These projects were approved with less scrutiny and oversight than the newer projects, and with less stringent noise regulations. Many of these older projects had setbacks from receptors less than the minimum 550 meters required after 2010.*

### *CONSIDERATIONS FOR BRIDGING OR CONTRACT EXTENSIONS FOR WIND FACILITIES*

*If contract bridging or extension is being considered for ECA era projects; the MECP should first determine if a facility under consideration could meet today's compliance standard.*

*In the likely event that it could not; the MECP should require the facility owners to determine if the facility could be operated with fewer turbines, or at lower output levels that would meet today's compliance standard.*

*In the event that a facility could not operate at a lower output level, that facility should not be considered for contract bridging or extension.*

### *BRIDGING OR EXTENSIONS WITH NO CHANGES*

*This is not advisable and carries certain risks.*

*If existing wind facilities are being considered for bridging or extension despite an inability to meet today's compliance requirements; there are several key items to consider.*

*There is an assumption that the facilities meet the noise compliance regulations in effect at the time.*

*As a preliminary step for any consideration for contract bridging or extension for projects approved under the older ECA protocols; the MECP should first review such projects to ensure that the facility can actually meet the noise regulations under the then current guidelines INTERPRETATION FOR APPLYING MOE NPC TECHNICAL PUBLICATIONS TO WIND TURBINE GENERATORS*

*That noise guideline, in effect at that time, requires a “Noise impact assessment under a “worst case scenario” at the critical Points of Reception.” using the ISO 9613-2:1996 protocol.*

*It should be obvious that the worst case scenario would require the turbines to be operating at output levels with the maximum noise levels as determined by the turbine manufacturer.*

*It should also be obvious that noise levels should be modelled with the site-specific night-time wind shear. Since many turbine specifications report noise at a standard wind shear of 0.22; the modelled noise calculations should be adjusted to the site-specific night-time wind shear which is generally around 0.30 to 0.35 in southern Ontario.*

*The increase in modelled noise between 0.22 and 0.33 wind shear for one turbine model in use at the time, the Vespas V82, can vary from +4.7 dBA to +4.8 dBA at wind speeds of 6 and 7 ms. This data can be found in the Cedar Point Noise Impact Assessment Report, Table A1D.*

*[https://www.nexteraenergycanada.com/content/dam/neecanada/ca/en/pdf/cedar-point-ii-wind-energy-centre/design-and-operations-report/Appendix B \(1\).pdf](https://www.nexteraenergycanada.com/content/dam/neecanada/ca/en/pdf/cedar-point-ii-wind-energy-centre/design-and-operations-report/Appendix B (1).pdf)*

*Some acoustic consultants did not adjust noise levels for the site-specific wind shear because it was not explicitly stated in the then current noise protocol. This was later corrected in the next iteration of the protocol.*

*Thus some wind facilities that were modelled without wind shear adjustments would not be able to meet the then current noise guidelines, if modelled properly to provide “a worst case scenario”*

*The MECP should ensure that such “legacy” wind facilities do not continue to operate past their end of contract dates without assurances that such projects can, as a minimum, meet the then current noise guidelines, including the site specific wind shear and the properly*

*applied ISO 9613-2:1996 protocol; or can operate with fewer turbines, or at lower output levels to meet those noise regulations.*

*If a facility cannot meet those requirements in the original contract, it would be a breach of the public trust to allow it to operate past its end of contract date.*

#### *CONSIDERATIONS FOR REPOWERING*

*Repowered projects should be compliant with all of today's compliance protocols for noise assessment and noise audits.*

*Repowered turbine sites should be limited to sites that do not have any receptors within 550 meters.*

*Repowered turbine sites should be limited to sites that meet the current setback regulations from roadways and adjacent roadways.*

*Turbines that do not meet the setback regulations should be removed from the site.*

#### *SUMMARY RECOMMENDATIONS*

##### *Bridging or extensions*

*Neither the IESO, nor the MECP are obligated to allow a facility to operate past its end of contract date. If a legacy wind facility cannot meet the noise guidelines in place when its contract was awarded, or cannot be operated at lower output, or repowered/upgraded to meet the current noise guidelines due to site restrictions, it should not be a candidate for contract bridging or extension. Such facilities should be decommissioned at the end of the contracts and removed from the site at the expense of the project owners.*

##### *Repowering*

*Repowered wind facilities should place new turbines only on sites with no receptors within 550 metres.*

*Repowered wind facilities with changes to noise profiles should be evaluated as completely new projects with today's protocols. Noise modelling should be calculated with the recently updated ISO 9613-2:2024.*

*Repowered wind facilities with a claim of no change to the noise levels should not be exempt from today's noise compliance regulations. No new turbines should be installed at sites with receptors closer than 550 metres, and older turbines at sites with receptors closer than 550 metres should be removed.*

*The MECP should require these projects to complete a noise audit within 12 months of the commercial operating date.*