

Feedback Form

LT2-RFP Joint Session, February 22, 2024

Feedback Provided by:

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Organization: Canadian Renewable Energy Association (CanREA)

Date: March 7, 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 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
What are some considerations if certain technology types were limited, or restricted from being developed on Ontario’s prime agricultural areas?	See General Comments / Feedback below.
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?	See General Comments / Feedback below.
What would the impact be if there were requirements to avoid, minimize and mitigate agricultural impacts in prime agricultural areas?	See General Comments / Feedback below.
Based on what you heard today, do you require additional clarity on agriculture land restrictions? Why or why not?	<p>CanREA members, municipalities, landowners and other stakeholders would benefit from clear, plain language guidelines for wind energy, solar energy and energy storage development in prime agricultural areas.</p> <p>Further clarity on how any provincial requirements may fit with any LT2 RFP requirements, such as municipal support resolutions, would be helpful.</p> <p>A comprehensive, plain language LT2 guidance document from the IESO which outlines applicable policy, regulatory and LT2 RFP requirements would benefit all stakeholders.</p>

General Comments/Feedback

Current Ontario policy can allow wind generation projects in prime agricultural areas, due to their limited footprint. These policies are more restrictive for solar and energy storage projects which are subject to additional policy requirements because of their larger footprints – including an evaluation of alternative locations that avoid prime agricultural areas and mitigation of impacts.

CanREA recommends that Ontario consider orienting agricultural land use policy in a manner similar to Alberta's recently announced 'agriculture first' approach for renewable energy project approvals. This approach allows wind and solar generation on Class 1 and 2 lands if they can demonstrate that they can co-exist with agriculture.

We believe that this is a sensible approach. CanREA's law firm members who represent Ontario farmers in negotiations with renewable energy developers describe numerous cases where siting of renewable energy projects on agricultural lands has provided additional income to allow farmers to stay on the land – making farming careers sustainable for them and their families.

Should additional restrictions be imposed, renewable energy development would be forced into less desirable areas with lower wind and solar potential, located further away from load centres. This would result in system inefficiency, reduced levels of project investment and higher cost solutions for Ontario ratepayers.