

# Feedback Form

## LT2-RFP Joint Session, February 22, 2024

### 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 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](mailto:engagement@ieso.ca) by **March 7, 2024**.**

What are some considerations if certain technology types were limited, or restricted from being developed on Ontario's prime agricultural areas?

Enbridge appreciates the importance of preserving prime agricultural land, and we factor this into our project development and siting efforts. Where possible we avoid the highest-producing land altogether, and where it is not possible, we work to design the project to enable ongoing agricultural activities. For example, we may locate turbines on corners where possible, or may allow grazing on our solar sites.

It is also important for Ontario ratepayers that the electricity grid is affordable and reliable. There are multiple factors and costs taken into consideration when siting a project (interconnection, available transmission capacity, resource potential, etc.). Renewable energy generation must also be located where the wind and/or solar resources are strong to maximize the benefits to ratepayers. In some cases, this may require development on or within agricultural land or areas.

Landowners and municipalities are in the best position to determine the value and ramifications of particular land uses on specific parcels of land, including agricultural lands. For example, our experience working with landowners and municipalities is that some class 3 and 4 lands are more productive than class 1 and 2 lands. In some cases, landowners have made improvements and investments for class 3 and 4 lands to have better soil. In these cases, the landowners and municipality may prefer to see development on less productive class 1 and 2 land in the area. This local perspective is helpful in mitigating the impacts of development.

Broad prohibitions on energy development can also be harmful to municipalities that benefit from renewable energy projects sited in their municipality, including reliable and affordable access to electricity, community benefits agreements and additional revenue streams. Similarly, landowners and farmers should have the opportunity to maximize the economic value of their own property. Agriculture is extremely important, however landowners may want or need to supplement their income using their land. For example, the market price for crops can vary, as can crop yields, and landowners should not be prevented from utilizing their land for viable supplemental revenue

streams, benefiting from the siting of clean energy projects supporting Ontario's Energy infrastructure.

Ensuring there is no prohibition applied to such specific and varied local conditions will limit any potential unintended consequences for such complex land use considerations.

For these reasons, IESO should recommend that the Minister not adopt strict prohibitions on development on certain classes of land. Instead, the Minister could provide guidelines for development on prime agricultural land. This would enable economic siting of energy infrastructure, while ensuring that the provincial and municipal governments have the tools needed to assess projects and reasonably preserve agricultural land.

<b>Topic</b>	<b>Feedback</b>
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?	Same considerations as above.
<b>Topic</b>	<b>Feedback</b>

<p>What would the impact be if there were requirements to avoid, minimize and mitigate agricultural impacts in prime agricultural areas?</p>	<p>Mitigation of agricultural impacts can be managed through collaboration with the landowner and with the municipality. Enbridge works to avoid the highest capacity agricultural land and to adopt construction approaches that minimize impact to soils and other environmentally sensitive attributes. Enbridge has also undertaken major environmental restoration work at currently operational sites, including planting of native species and restoring wetlands where the land was not being used for agricultural purposes. Enbridge will continue to take this approach in development and operations.</p> <p>IESO should recommend that the Minister not adopt strict prohibitions on development on certain classes of land. Instead, the Minister could provide guidelines for development on prime agricultural land. This would enable economic siting of energy infrastructure, while ensuring that the provincial and municipal governments have the tools needed to assess projects and reasonably preserve agricultural land.</p>
<p><b>Topic</b></p>	<p><b>Feedback</b></p>

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Based on what you heard today, do you require additional clarity on agriculture land restrictions? Why or why not?

Several municipalities on the webinar identified a lack of clarity on the flow of information from the Province and municipal resource constraints to understand and interpret the provincial guidance. A statement of clarity to municipalities that there is no provincial restriction for development on any land classification, along with the issuance of guidelines would have great benefit in aiding municipalities. This would encourage the ability of municipalities to permit and benefit from the development of much needed generation in the province, while reasonably preserving productive agricultural land in their jurisdictions.

IESO should recommend to the Minister that the Province provide guidelines for development within agricultural lands and areas, without imposing strict prohibitions. This guidance could be helpful for municipalities working to approve new energy infrastructure in their jurisdiction. This would enable economic siting of energy infrastructure, while ensuring that the provincial and municipal governments have the tools needed to assess projects, apply mitigation measures as appropriate to each specific project, and preserve prime agricultural land.

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## General Comments/Feedback

Enbridge values maintaining high-capacity agricultural land where possible, as well as ensuring that Ontario ratepayers have a reliable and affordable electricity grid in the low-carbon world. We aim to avoid the most productive land when developing and siting our wind and solar projects. We also work with landowners to site assets in a way that minimizes disruption to their farming activities such as locating turbines on corners where possible and enabling grazing options where feasible.

Wind and battery energy storage projects require very little land relative to their nameplate capacity and can be co-located with agricultural activities. Similarly, solar equipment and materials are light duty and lands can be fully returned to productive use at the end of the project. This infrastructure contributes to an affordable and reliable grid when located near load, available transmission capacity, and where the wind or solar resources are strongest, which may sometimes require development on agricultural land. The key is to find the right balance, in cooperation with the landowner and the local municipality.

For these reasons, IESO should recommend to the Minister that the Province provide guidelines for development on agricultural land, without imposing strict prohibitions. This guidance could be helpful for municipalities working to approve new energy infrastructure in their jurisdiction. It would enable the economic siting of energy infrastructure, while ensuring that the provincial and municipal governments have the tools needed to assess projects, apply mitigation measures as appropriate to specific projects, and preserve prime agricultural land.

This approach would also enable landowners to explore all revenue options. For example, certain land may seem well suited to high agricultural production, but climate change and related weather impacts or any number of other factors may reduce that land's capacity to produce. Similarly, the market for a particular crop may be underperforming due to international subsidies, competition from elsewhere in Canada, or other factors. Landowners should be able to supplement their agricultural income to host renewable energy infrastructure within guidelines set out by the province.

Although several jurisdictions in the United States and Canada have explored prohibitions for energy projects on agricultural land, we are not aware of any that have adopted strict anti-development rules. Instead, governments have favoured a guidelines-based approach for consideration at the local level. As land-use considerations, soil types and local context vary by region there is no one universal approach or set of guidelines that fits all, and Ontario will need to do develop its own guidelines and best practices.

We recommend that IESO and the Government of Ontario hold further consultations on these guidelines. We look forward to continuing to participate in such consultations.