

Feedback Form

Long-Term 2 RFP – June 13, 2024

Feedback Provided by:

Name: Click or tap here to enter text.

Title: Click or tap here to enter text.

Organization: Click or tap here to enter text.

Email: Click or tap here to enter text.

Date: Click or tap here to enter text.

To promote transparency, feedback submitted will be posted on the Long-Term RFP engagement page unless otherwise requested by the sender. If you wish to provide confidential feedback, please mark "Confidential".

Following the LT2 RFP June 13, 2024, engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the items discussed. The presentation and recording can be accessed from the LT RFP [engagement web page](#).

Please submit feedback to engagement@ieso.ca by June 27, 2024.

Developing on Agricultural Land

Topic	Feedback
Do you have any comments regarding the provision proposed within the Ministerial letter to: "Provide rated criteria points for projects that avoid prime agricultural areas. "	
Do you have any comments and considerations regarding the implementation of the Agricultural Impact Assessment (AIA)?	

Resource Eligibility

Topic	Feedback
Repowering considerations: Do you have any feedback to share regarding other resource types opportunities for repowering/refurbishment under the LT2?	
Hybrid considerations: Do you have any feedback to share regarding hybridized facilities under the LT2?	

LT2 Contract Provisions

Topic	Feedback
Performance Obligations: Do you have any feedback to share regarding minimum Imputed Production Factor thresholds or the proposed calculation approach for Non-Performance Charges?	

Topic	Feedback
<p>Excess Deemed Market Revenues: Do you have any comments regarding the percentage of the negative Grid Reliability Payment that is to be paid back?</p>	<p>As indicated in previous feedback on the revenue model, payments under the contract should be based on actual electricity produced when required by the grid with the estimation calculations and the Grid Reliability Payment should be eliminated from the process. The industry boasts how cheap renewables have become meaning that projects should be financially viable without subsidies from the users of electricity.</p>

General Comments/Feedback

The use of the Agricultural Impact Assessment process was introduced in the June 13 webinar with feedback provided on how the generic process would need to be adapted for the tool to be useful in providing information needed by municipalities in evaluating the consideration of alternate sites and the impact of the proposal on Prime Agricultural Land.

It was expected that revisions to the process would be provided for discussion in the July 4 webinar but this was not included in the agenda. Given this absence, the following feedback on the assessment of the impact on prime agricultural land so that it can be discussed and included in the LT2 - RFP documentation.

The standard Agricultural Impact Assessment process needs to be modified to apply to the assessment of wind turbine projects. The impact of a wind turbine project is complex and includes construction and operational impacts as well as the post-decommissioning impact.

The following are key considerations:

Evaluation of Alternate Sites:

The proponent needs to document alternate sites with similar wind resources that were considered before the subject site was selected as the only alternative. These alternate sites will likely be outside of the boundaries of the subject municipality. Specific considerations that lead to the rejection of the alternate sites on non-prime agricultural land will need to be provided.

Use of Multiple Properties for a Single Project:

The assessment process will need to provide a review of each property that will be used in the project. Specific instructions will be needed for items to be included in this assessment:

- Land area required for construction and operation of the wind turbine.
- Confirmation that the cement foundation of the turbine will be fully removed so that the land will be returned to full production.
- Land area required for access roads both for construction and operation of the wind turbine plus land area needed for maintenance activities during operation (i.e. blade replacement).

- Land required for lines and other equipment needed to connect each turbine with the substation.
- A total of land required from each plot plus a summary of these data for the whole project.

Impact of Project on Drainage Infrastructure

The impact of the project construction on drainage infrastructure along with a plan to immediately correct any negative impacts. This includes both municipal drainage projects plus drain systems for individual properties.

Maintain Viable Field Size

The assessment should include confirmation of the steps taken to maintain the large field sizes needed for efficient modern mechanized farm operations.

Separation from Buildings Housing Livestock

Just as residential buildings require separation from buildings housing livestock, wind turbines need to be located at a sufficient distance from livestock facilities to protect the animals from the noise emissions from wind turbines. The MECP will be able to provide numerous examples where issues linked to noise emissions from wind turbines and/or transformer stations related to the project have for the closure of animal production operations.

Linking AIA to Municipal Support Resolution

As the use of Prime Agricultural Land will be a major factor is the approval of Municipal Support Resolutions, an AIA should be included in the list of supporting documentation provided along with the request for Municipal Support. Deferring the submission of the AIA until later in the process risks the approval of the wider municipal support resolution.