

# Feedback Form

## Long-Term 2 RFP – April 24, 2025

### Feedback Provided by:

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Date: May 16, 2025

To promote transparency, feedback submitted will be posted on the LT RFP engagement page unless otherwise requested by the sender.

- ☐ **Yes – there is confidential information, do not post**
- ☒ **No – comfortable to publish to the IESO web page**

Following the LT2 RFP April 24, 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 LT2 [engagement web page](#).

**Note:** The IESO will accept additional materials where it may be required to support your rationale provided below. When sending additional materials please indicate if they are confidential.

**Provides feedback on the changes made to Draft LT2(e) RFP circulated on May 15 in response to feedback provided during the April 24 webinar. Comments also reflect learnings at 3 community meetings in South West Oxford and Malahide Township discussing 2 proposed wind turbine projects.**

## Tariff Risk Mitigation

Do you have any comments related to the tariff risk mitigation concepts presented during the webinar?

## LT2 RFP and Contract Updates

Do you have any comments related to the other RFP and Contract updates presented during the webinar?

## Status of the AIA

In the meeting of April 24, the problems created by the division of the Agricultural Impact Assessment into 3 phases were raised. This division does not align with the discussions currently taking place in the municipal consultation process. The information provided on May 15 does not address those gaps. It is noted that no details have been provided even on the contents of the Phase 1 document.

The key concern in rural southern Ontario is protection of Prime Agricultural Lands and the constraint imposed by the 2024 PPS is that non-agricultural uses be “limited in scope”. As discussions about energy projects are currently underway, municipalities and affected communities need this information now. If OMAFRA is not able to provide direction on assessing the size of a project, then the process should be delayed until that guidance can be provided.

In the absence of AIA guidance on the estimates of the land required by project components provided by proponents are a concern. While they fall within the limits suggested in the current documents, they do not align with previous experience with the land requirements of similar projects. This leaves the municipal Councils and community groups operating in the policy vacuum created by the IESO.

In the case of a project involving multiple wind turbines, it is assumed that individual AIA's will not be prepared for each turbine. Rather a single AIA will be prepared for the whole project which means that even these low estimates of land required for a single wind turbine will indicate that the entire project will fail to meet the “limited in scope” of 1 HA per project.

Clarification of the rules on determining project land requirements along with the full AIA direction is required before municipal councils are asked to support Municipal Support Resolutions. It also exposes the municipal support resolutions based on faulty claims from proponents subject to appeal to the Ontario Land Tribunal as the project is not aligned with the requirements of the Provincial Policy Statement.

This direction cannot wait until 18 months after the contracts are issued, the full AIA needs to be available before municipalities are asked to approve support resolutions. If the document cannot be finalized to meet the current timelines, the submission deadlines for the RFP need to be adjusted to align with the AIA timelines.

The reference for the definition for AIA Component Two and Three Requirement to Draft LT2(e-1) is meaningless until that version of the contract or the full AIA document is available.

## **Definition of Prime Agricultural Area**

The addition of a reference to the Provincial Policy Statement 2024 as context for the definition of Prime Agricultural Areas is an important clarification as many municipal official plans have not been updated to reflect this new direction. Making these changes can take considerable time and this additional clarification allows project proponents to use the original soil maps that will be the basis of the new plan while the plan is being developed.

## **Alternate Sites**

If a project is to be located in a Prime Agricultural Area, the process requires proponents to provide municipalities with an assessment of alternate sites that they have considered. The assumption is that if no more appropriate sites are identified, then it is appropriate to proceed with the recommended location.

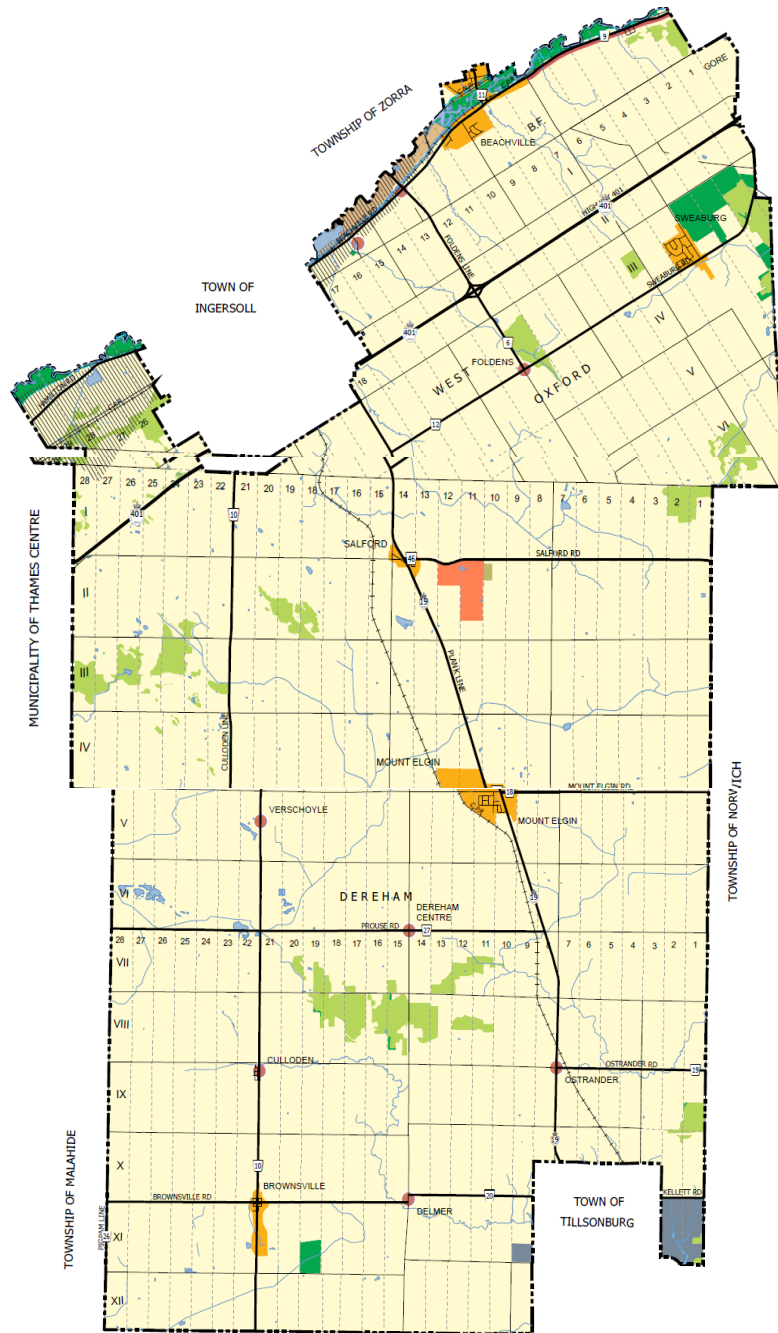
In many municipalities in southern Ontario, the protection provided to Prime Agricultural Areas essentially eliminates most of the municipality from consideration as a site for an energy project. Areas that are not used for agriculture are wooded or slope toward rivers or bodies of water.

Energy projects can be located in a wide range of locations and the IESO points system confirms an IESO preference for sites outside of Prime Agricultural areas and in northern Ontario. On this basis, it is not appropriate to limit that analysis of alternate sites to a single municipality, particularly if municipality is largely classed as a Prime Agricultural Area.

The attached map of zoning in South-West Oxford illustrates the situation. Two wind turbine projects are proposed for this township. Clearly there is no way that either of them can avoid use of Prime Agricultural Areas which are shown in light yellow in the map.

To be consistent with the IESO's and the government's direction, municipalities need to have the option of not supporting a project even if the proponent claims to be unable to find an alternate location that meets the IESO's preferences and the requirements of the PPS.

## Rural Zoning in South-West Oxford



## LT2 RFP Requirements for Crown Land Projects

Do you have any comments regarding the new Proposal Submission requirements for Crown Land Projects?

## LT2 RFP Deliverability Update

Do you have any comments regarding the deliverability guidance updates presented during the webinar?

## General Comments/Feedback