

Feedback Form

Long-Term 2 RFP – May 21, 2025

Feedback Provided by:

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Date: June 3, 2025

To promote transparency, feedback submitted will be posted on the LT2 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 May 21, 2025, 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.

Please submit feedback to engagement@ieso.ca by May 29, 2025. Document could not be prepared until the draft Agricultural Impact Assessment document was released.

Post-Proposal Applicable Tariffs

Do you have any comments related to the approach to mitigating the risk of Post-Proposal Applicable Tariffs presented during the webinar?

Gas Turbine Delivery Delay Provisions

Do you have any comments related to the approach to handling potential delays in the delivery of gas turbines presented during the webinar?

Crown Land Site Report and MNR Confirmation Letter

Do you have any comments related to the CLSR and MNR Confirmation Letter requirements presented during the webinar?

LT2 RFP Deliverability Update

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

Slide 24 is incomplete as it does not mention the wind turbines being located in Prime Agricultural Areas as defined by the Ministerial Director. Not sure if this was an oversight but it is an important omission as the current version suggests that the only restrictions for wind turbines are in Specialty Crop Areas which is not correct. This gap could be contributing to the confusion among proponents about the restrictions on using Prime Agricultural Lands.

General Comments/Feedback

Restrictions on Wind Turbine Projects in Prime Agricultural Areas

The following provides comments on various aspects of the proposed LT2-RFP process as it related to projects on Prime Agricultural Areas. It makes observations on the process based on work with various community groups in municipalities across the province. As currently structured, the process is causing confusion and raising concerns in municipalities which should not be taking place with a high-profile provincial program that has wide impact across the province. There are a number of areas that should be addressed with revisions to the final package before roll-out starts. If changes are not made, the program has the potential to become an embarrassment to the provincial government.

Implementation of the October 2024 Provincial Policy Statement (PPS)

The Ministry of Municipal Affairs and Housing released a new Provincial Policy Statement to municipalities regarding priorities. Municipalities do not have an option but to follow the priorities set out in this PPS, including the protection of land used for agriculture.

While the IESO can add restrictions on energy projects, such as the prohibition of ground mounted solar projects in Prime Agricultural Areas, the wider IESO program needs to be fully compliant with the direction set out in the PPS so that municipal governments are not getting conflicting direction from two provincial agencies.

The PPS is clear that wind turbine and BESS projects will only be allowed on Prime Agricultural Areas if they are limited in size. Also if use of prime agricultural land is proposed, a review of alternate sites is required.

These restrictions on the use of Prime Agricultural Areas for energy generation and/or storage align with the general view of local farm communities where most residents share the province's view that prime agricultural areas is an important resource that needs to be protected when sites in other areas of the province are available. Projects being proposed on prime agricultural are being opposed due to this desire to protect farmland for the long term.

Unlike the solar companies, many wind companies are continuing to develop project proposals in the agricultural areas despite these PPS restrictions. This is causing concern in these communities and the IESO needs to work with the renewable energy industry to ensure that the government's direction on use of Prime Agricultural Land is understood.

Official Plans in Place of the Provincial Policy Statement

The LT2-RFP documents need to require conformity with the PPS with municipal official plans being the core reference document. While this may be a more readily available substitute that works in most cases, working with actual situations in communities shows that it is not a replacement in all cases.

In Ottawa, for example, the existing Official Plan includes only Class 1-3 soils in the agricultural zone. This omits protection for Class 4-7 soils as required by the PPS. Ottawa is in the process of amending their Official Plan to correct this situation and evaluation of projects needs to consider this new definition.

Similarly, the Official Plan for Brooke-Alvinston includes only Class 1-3 soils in the agriculture zone but as this zone covers almost all of the non-urban areas in the municipality, the discrepancy does not make a material difference in evaluating energy projects.

Current Municipal Activities

People involved with the development of LT2 RFP process should be monitoring the actual discussions at municipal council meetings about the process and the types of information that they are seeking that is not available to them.

For example. the Council in Zorra in Oxford County adopted a motion at a meeting on October 16 that included the following:

THEREFORE BE IT RESOLVED that until the Ontario Government, Ministry of Energy and Electrification, and the Independent Electricity System Operator changes the procurement process to allow municipalities to be better informed on issues such as,

but not limited to: agricultural impacts, health impacts, environmental impacts, the Township of Zorra will not be providing Municipal Support Resolutions;

At the May 29 meeting of the Council of Brooke-Alvinston, a member of Council who farms asked when the remaining sections of the Agricultural Impact Assessment would be available and suggested that the Council should delay decisions on the project under consideration until that guidance was available. There was discussion about formalizing this and sending it directly to the IESO.

In Malahide Township, councilors expressed concern at the evasive answers being given to questions as well as answers that are not seen as credible (6 MW wind turbines only need 3 metres foundations). Another councilor, who has a well drilling business, expressed concerns about the high-water table and the shallow nature of the wells in parts of the area being proposed for wind turbines.

The overall sense was that the company proposing a project in Malahide had not done the amount of research to understand the nature of the community whom they are working.

In Oxford County, a proponent has tried to develop a wind turbine project in various locations that municipalities have rejected as being on prime agricultural land (Class 1-3 soils). His search for an alternate location has involved moving to another municipality where the project was similarly proposed on prime agricultural land. There was no search for alternate sites where the project would have a lower impact on agricultural activities.

Clearly the IESO has not effectively communicated the Minister's directive that wind projects be developed on land with low potential for agriculture and in northern Ontario.

The experiences outlined above then suggest that the people selling wind turbine projects to local communities have not updated the techniques. In the past, it was possible to provide incomplete, misleading or inaccurate information to Councils and community groups. Because experience with the technology has increased and people have observed what wind turbine projects have done to other communities, they have detailed questions about the proposals and expect serious answers that reflect an understanding of their community.

Evasive answers have not resulted in the support that proponents are seeking and it unlikely that this will change going forward. In this context, they need to provide more information above the minimum that the IESO is proposing. Continuing along the current process will not result in the LT2-RFP delivering many positive responses to the IESO and the failures will belong to the proponents and the IESO process which allowed past practices to continue, not the community.

Agricultural Impact Assessments (AIA)

In the current experience with recent municipal and community discussions, limiting the scope for the AIA available at this time is a step in the wrong direction. Councils are looking for more information to support requests for municipal support, not less.

Yes, municipalities can ask for more information but to build trust with a municipality, the proponent needs to anticipate questions and provide the answers without being asked. Information on problems with existing wind projects are well known across at least Southern Ontario and the proponent needs to address these concerns. Or the municipality assumes that the proponent is hiding something. The resolution passed by the Zorra Council is an example of this response.

Assessment of Alternate Sites

The methodology to assess alternate sites may look like a creative compromise from the Toronto perspective, and it may actually work in some municipalities, it will not work in the municipalities in Oxford, Middlesex and Lambton which are dealing with active proposals. The municipalities are largely Class 1, 2 & 3 agricultural land and there is no lower potential land that can be used.

The methodology sets out an imaginary process that does not align with the actual methodology used by the wind industry to develop proposals. Agents approach farmers asking them to sign lease agreements. When sufficient leases are signed in an area, a project proposal is developed based on these leases. Analysis of soil capability is not part of this process and the result is projects that are focused on Prime Agricultural Areas.

Once the project is designed, it is very difficult to drop sites and add sites with lower soil capabilities, if they exist. Adding analysis of soil capabilities as suggested in the AIA after a project is developed which change the project with great difficulty. These guidelines have been released when it is too late to affect many projects and unless the IESO takes steps to enforce use of these guidelines, the process for LT2 will remain focused on seeking farmers who are willing to sign leases.

None of the examples in the AIA process reflect the situation in Brooke-Alvinston, Malahide and South-West Oxford, where there is not sufficient areas with lower soil capabilities to support a project. This gap should be corrected.

The PPS requires that the municipality protect this land for long term use in agriculture and protection of prime farmland is also a core principle for residents of these communities. This makes gaining municipal support for a wind turbine project a very long shot. The IESO needs to take steps to focus proponents elsewhere.

Define “Limited in Scope”

A core qualifier in the PPS for the development of energy projects in Prime Agricultural Areas is that the development be “**limited in scope**”. As most available information suggests that normal wind turbine projects will not meet this requirement, the initial phase of the AIA needs to expand on the existing rules in the OMFRA document on what lands need to be included in this assessment. There is no point in issuing a contract for a project that will not meet this requirement and then finding out 18 months later that it does not qualify.

Providing these instructions will also help align projects with the requirements set out in the PPS as required by the Minister’s directive. This should not be onerous for the proponent as

in a recent Brooke-Alvinston Council meeting, the proponent made many references to a draft project plan that they have developed. Many proponents are promoting incomplete and an inaccurate information for the land area required for their project. Generally, this information is provided for a single turbine site rather than the complete requirements for the whole project.

Prime Agricultural Areas with No Official Plan

While the Township of Kearns does not have an Official Plan, agricultural activities are an important part of the economy in this area of Northern Ontario. It is not appropriate to ignore locations of this type and the AIA should include instructions on handling this situation. Positioning of energy facilities should be made in the context of the soil types as defined in the PPS. It is not appropriate for the IESO to allow agriculture activities to be ignored in Kearns, and other municipalities without Official Plans. These municipalities are still governed by the requirements of the PPS and they will need to be considered when building permits are issued for the project. The AIA process needs to discuss how these situations will be treated.

Provide Basic Project Details

The RSP process sets out some basic information requirements that the proponent must provide to the municipality and the local community as part of the consultation process. In most of the projects under discussion with Brooke-Alvinston, Malahide and South-west Oxford, the proponent has not publicly provided the basic information required by the IESO process including the number of turbines, their nameplate capacity and the specific location of the project. Residents have observed that the website for one project proposed for South-West Oxford showed specific turbine locations at one point but these have recently disappeared. Accessing the website now generates an error message in German. In Brooke-Alvinston, different information on the number of participating landowners was provided in a closed meeting of Council compared to the information provided earlier in the open Council meeting.

Other Information

As indicated previously, municipal councils and community groups have a good understanding of the impact of a wind turbine project on agricultural operations. This creates a need for proponents to address a range of issues. These can be included in a later phase of the AIA but unless municipalities are looking for this information before the MSR is approved.

For example:

- **Stray Voltage/Dirty Electricity** – farm communities are familiar with the issues created by the problems in livestock operations so proponents will need to be prepared to explain how this will be managed. This is particularly true in Brooke-Alvinston where the proponent is proposing to use a collector system using above ground lines strung on poles – a process linked to stray voltage/dirty electricity in other projects..
- **Well Contamination** – After the experience in North Kent, proponent need to be prepared to address questions about their response to any contamination of farm wells that are contaminated by the construction and/or operation of the project could

be discussed. In communities, with high water tables, this should be included in the Phase I AIA.

- **Set-backs** – The number of unresolved complaints about noise emissions from existing wind turbines indicate that the current regulations are insufficient for exiting wind turbines in the 2.5 to 3 MW range. The new projects being proposed involve the use of un-named turbines in the 5 MW to 6 MW range. Due to seriousness of the technology change, proponent will need to provide information in the Phase 1 AIA on the increased set-backs that will be used between wind turbines and non-participating farm residents related to livestock operations. Unlike cash crop operations, these people cannot relocate to small towns. On-site supervision of the operation is required.
- **Plans for Decommissioning** – Given the frequency that wind projects have changed hands, municipalities are concerned with responsibility at the end of the lease for removal with turbines and related infrastructure which is estimated at a \$1 million per turbine. This discussion needs to take place before a municipality commits to support the project as this support can bring responsibility for decommissioning costs.

Also, the degree to which prime agricultural land will be returned to production with one current proponent suggesting that only above ground infrastructure will be removed. This suggests that there will be no steps taken to remove that massive steel and concrete wind turbine foundations from Prime Agricultural Areas.

- **Fire Safety** – Fire safety has been a discussion point at some Council meetings related to projects. Some municipalities have legislation that requires that the developer of a wind turbine project provide fire suppression capabilities in the nacelle and to connect a fire alarm detection system with the nacelle with the local 911 dispatch centre. The developer's approach to this matter should be included.
- **Shadow Flicker** – Shadow flicker has also been a concern to neighbouring farm operation motivating some municipalities to require wind turbines to operate in a manner that the shadows created by the moving blades only fall on land controlled by the proponent.
- **Interference with GPS** – GPS guidance systems perform an important role in the operation of current farm equipment. It was reported in a meeting that a farm operator asked a proponent about steps being taken to deal with this issue but had not received any answer to his question. He is asking his municipality to get an answer for him.

Summary

Observing municipalities and community groups dealing with proponents for wind turbine projects that are part of the LT2 RFP process suggests that the proponents either do not have a clear understanding of the requirements for protecting agricultural land in line with Minister's directives or they are ignoring this requirement.

Generally the key objective of the participants appears to be finding methods to avoid the requirements of the Provincial Policy Statement. This puts the proponents in a conflict situation with municipal officials who are required to implement the requirements of the

PPS. It also puts them in conflict with the local farm community which is committed to preserving the agricultural land.

This situation has not improved with the proposed directions provided in the AIA which appear to be designed to allow projects to proceed without consideration for agricultural operations.

The IESO needs to redirect the focus for wind projects to land with lower potential agricultural operations.