

Feedback Form

Hybrid Integration Project – January 26, 2023

Feedback Provided by:

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Following the January 26, 2023 webinar on the Hybrid Integration Project, the IESO is seeking any general feedback from participants on the presentation.

The referenced presentation can be found under the January 26, 2023 entry on the [Hybrid Integration Project webpage](#).

Please provide feedback by February 16, 2023 to engagement@ieso.ca. Please use subject: *Feedback: Hybrid Integration Project*. To promote transparency, this feedback, if provided in an AODA-compliant format (e.g. using this form) will be posted on the [Hybrid Integration Project webpage](#) unless otherwise requested by the sender.

Thank you for your time.

General Comments/Feedback

The Ontario Federation of Agriculture (OFA) represents more than 38,000 farm family members. OFA has a strong voice for our members and the agri-food industry on issues, legislation and regulations administered by all levels of government. We are passionate and dedicated to ensuring that the agri-food sector and rural communities are considered and consulted with for any new or changing legislation that would impact the sustainability and growth of our farm businesses.

Ontario's agri-food sector is an economic powerhouse – producing more than 200 farm and food products, fuelling rural communities, generating nearly 750,000 jobs, and contributing over \$47 billion to Ontario's annual GDP. The province's agri-food strategy, Grow Ontario, aims to strengthen the agri-food sector, support economic growth, and ensure an efficient, reliable and responsible food supply. By removing barriers, unnecessary costs and red tape, Ontario farmers will be positioned to seize opportunities and rise to the challenge of an ambitious growth strategy, allowing the agri-food sector to drive the economy forward.

Ontario's electricity system presents challenges to the IESO, for example, we have transmission level wind and solar generation (and at the distribution level) in Ontario that relies on ambient conditions that leaves facilities unable to participate in commitment markets. The amount of sunlight or wind makes determines when it cannot be used, and when it cannot be used, it is curtailed (cancelled but paid for).

Adding storage allows these resources to commit electricity for an uninterrupted period – it allows these systems to compete in electricity markets. OFA recognizes that when the system operator has more options available, reliability and efficiency increase. We also recognize that transmission system demands can be limited by local distribution network constraints.

To prepare for increased electricity demand in the following years, the IESO may rely on local resources at the distribution level to help balance transmission constraints. Local distribution energy resources will play an important role in meeting electricity demand efficiently, and reliably, and at costs customers can manage.

Decision-makers must enable DERs that serve rural (farm) community interests beyond simply helping the IESO balance grid system shortages. Policy design needs to include engagement with the farm sector before contemplating the assimilation of Ontario's finite farmland resources into industrial scales battery energy storage systems.

OFA Position on Non-Agricultural Uses of Land

OFA supports conservation of farmland critical to sustaining Ontario's agri-food sector. Prime agricultural areas are meant for agricultural and ag-related uses, compatible on-farm diversified uses and home-based businesses. Based on the new Census of Agriculture, we lose over 300 acres everyday in Ontario. It is important for farm business sustainability that we try to keep farm acres in farming. All industrial and commercial development should remain within existing industrial and commercial zones and mostly in urban settlement boundaries.

New industrial or commercial development in agricultural areas triggers OMAFRA Minimum Distance Separation (MDS) formulae and limit a farmer's potential for future expansion. There are benefits to keeping non-farm uses out of agricultural areas, including;

- reducing nuisance complaints (Farming & Food Production Protection Act),
- reducing conflicts with slow-moving farm vehicles on roads, and
- decreasing infrastructure costs.

While we recognize that DERs present the means for the IESO to reach objectives, they must also improve critical electricity system shortfalls in our rural communities, including

- the mitigation of uncontrolled ground current that can impact the mental health, animal health and financial health of our farm businesses,
- the avoidance of terminal line voltage drops resulting in damage to important motors needed to sustain our farm businesses,
- expanding 3-phase power assets, needed to ensure that farm businesses can compete in the 21st century, and
- addressing unmanageable service interruptions.

DERs can help improve these systemic shortfalls. The question is will BESS will plague our rural communities with dangerous risks that have not been presented or rationalized to rural communities, and also fail to improve local system deficiencies. This directly involves the IESO procurements needed to improve our electricity system, and specifically the RFPs they issued to procure up to 3,500MW of clean renewable generation combined with storage to ensure a facility can deliver uninterrupted RE generation for uninterrupted periods of time.