

Feedback Form

LT2 RFP: Joint Session IESO, MECP and MNRF

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 9, 2024, engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the items discussed. The webinar presentation and recording can be accessed from the [LT RFP engagement web page](#).

Please submit feedback to engagement@ieso.ca by February 23, 2024.

Item

Feedback

Please provide any general feedback to the IESO on what considerations need to be reflected in the LT2 Report Back on the procurement timelines and design to ensure efficient alignment with the proposed MNRF and MECP processes.

MECP processes:

- MECP confirmed that battery energy storage systems (BESS) will be subject to their own respective approvals processes. There is lack of clarity on how to gain an approval for BESS projects that is integrated with a solar or wind generation facility. MECP noted that BESS integrated with a wind facility would be approved under the same ECA/REA as the wind facility. More clarity is needed on how MECP will assess noise levels from the BESS i.e., would the BESS be assessed cumulatively with the existing wind facility's REA or if it would be assessed separately?
- MECP noted that existing wind facilities that propose changes to their projects such as repowering will require amendments to their existing approvals (including requirements to undertake noise assessments/audits if the proposed changes impact noise emissions). The requirement for existing facilities to meet updated acoustics standards creates a significant barrier to repowering. It would be beneficial, if the existing facilities' proposed change results in *lower noise emissions* than previously approved, it would be assessed/approved through an expedited amendment process, rather than a standardized REA amendment process. More clarity is also needed on how MECP will treat new receptors that have developed within the project grounds to be assessed with the update in technology, whether or not it would be assessed under what was approved with vacant lot receptor(s) in the approved REA.

MNRF processes:

- MNRF announced a one-window approach on applications for Crown land. While this one-window approach is great in concept, it could create a delay for developers from getting direct responses from the appropriate regional and district staff who will be the reviewers of these applications (for testing facilities and the renewable energy project). If the purpose of the one-window approach is to triage the applications to the correct regional and district offices, it would be beneficial if MNRF would consider providing prescribed information for

initial/early engagement pertaining to pre-development work to expedite the triaging process (e.g. testing facilities such as meteorological (MET) towers/LiDAR/SODAR).

- MNRF provided a 6-phase flowchart demonstrating the approval process of renewable energy projects. While this is helpful to understand the steps required, it is not clear on the overall timeframe from pre-development phase to construction & operation. It would be helpful for sector participants if MNRF would consider providing the following: (1) service standards for reviewing and approving pre-development/resource assessment work (e.g. 7-10 business days); (2) possibility of expedited review/approval process for testing facilities; (3) overall service standard/timeline for development of renewable energy projects on Crown Land from IESO Contract/Public Lands Process stage. Such information will be critically important for developers to understand, as it would allow de-risking the projects and provide investment confidence to proceed and submit LT2 procurement proposals.
- Section 5.1 and 5.2 of the *Approval and Permitting Requirements Document (APRD)* for renewable energy projects lists information and studies to be completed for testing facilities applications. EDFR notes that the information required for installing MET towers is extensive and we feel such requirements are more suitable for the construction of renewable energy projects. It is recommended that MNRF consider assessing minimum information requirements for MET tower applications from other jurisdictions (e.g. Quebec, British Columbia, Alberta) to help reduce burden on both the ministry and the developers for MET tower applications.
- It is of note that step #5 of *Phase 3 Procurement contract & site access* in the *Renewable Energy Approvals Process for Crown Land Wind, Solar and Bio-Energy Projects* (phase process) states “if application is accepted by MNRF, access will not be granted to any other applicant for the same site at the same time.” This indicates a possibility of MNRF *not accepting* the application on a project that has

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	<p>been awarded an IESO contract, which creates a significant risk by resulting in a potential breach of contract of inability to achieve Commercial Operation under the Power Purchase Agreement (PPA). To avoid this, the 'acceptability' of application for access will need to be determined much earlier on in the phases to mitigate the risk and provide contractual, investment certainty. In order to mitigate this risk, earlier engagement between MNRF and IESO need to occur prior to contract award (e.g. between #1 and #2 in Phase 2), to align processes, schedules, and ensure constructability of the project.</p> <ul style="list-style-type: none"> • More clarity is needed regarding the status of past wind power project applications on Crown Land and whether those project applications are still 'valid' and whether the lands are also available for new projects. • Further clarity is needed on MNRF's policy framework for solar power and battery energy storage systems.
<p>Please provide what additional details are needed to inform project siting, development, and timelines to ensure projects are in-service by 2030.</p>	<ul style="list-style-type: none"> • Greater clarity needed on service standards/timelines from MNRF on reviewing and approving approvals/permits for pre-development work as well as renewable energy projects. • Greater clarity needed on the feasibility of development & construction of renewable energy projects on Crown Land to be aligned with the IESO's LT2 procurement schedule. • Definition of 'low impact' pre-development activities. • Approval/permit matrix based on impact thresholds for pre-development activities along with service timelines for review and approvals.