

# 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](mailto:engagement@ieso.ca) by February 23, 2024.**

<b>Item</b>	<b>Feedback</b>
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.	There are unaddressed concerns with the “MECP processes”. See next Comment.

Please provide what additional details are needed to inform project siting, development, and timelines to ensure projects are in-service by 2030.

The MECP processes for approval of wind power projects and the regulations for siting, setbacks, and noise limits were created prior to passage of the Green Energy Act in 2009. Some regulations were updated but the most recently approved wind power projects (e.g., Nation Rise/Crysler) were approved under the former regulations (despite, as in the case of Nation Rise, employing new power generation equipment not in effect under the former regulations).

The MECP has literally thousands of files of formal Pollution Incident Reports or Incident Reports as a result of calls and emails for citizens living inside or near wind power projects. There have also been reports of problems with damage to the aquifer (see North Kent, which was the subject of a government-ordered scientific panel).

In many instances, noise complaints continue without resolution, which is a violation of the Renewable Energy Approvals (REAs).

In addition, while acoustic audits are required to verify compliance with regulations in Renewable Energy Approvals, at the present time, only 52% of operating wind power projects have successfully completed this audit process. In some cases, the audit process has gone on for years.

This is not indicative of a successful complaint management process as described by the MECP.

The MECP stated February 9<sup>th</sup> that it has no plans to revise any regulations such as setbacks between industrial wind turbines and homes, or noise levels.

We venture to say that both the MECP and the IESO are open to liability if yet another RFP for wind power is launched with this record of a failure of enforcement.

There are other issues of importance such as: the possibility of "repowering" wind turbines or extending contracts where there are violations of REAs and where even the inadequate current regulations were not in force at the time of approval and construction.

In short, it is unreasonable to expect citizens and their elected municipal officials to support new proposals, given

Item	Feedback
	<p>that problems with existing wind power facilities have not been addressed, and that new regulations, which are clearly needed, are not planned.</p> <p>In the February 9<sup>th</sup> presentation, the MECP claimed it had nothing to do with contracts. We believe this to be erroneous: if the MECP is aware of violations of REAs---or at a minimum, failures to fulfill the requirements of REAs such as acoustic audits to verify compliance with regulations---then the MECP does indeed have a connection to the contracting function.</p> <p>It is our position that no power developer in breach of REAs should receive a new contract or an extension to an existing contract.</p>