

Feedback Form

LT2-RFP Joint Session, February 22, 2024

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 22, 2024, LT2-RFP joint engagement with Ministry of Municipal Affairs and Housing (MMAH) and Ontario Ministry of Agriculture, Food, and Rural Affairs (OMAFRA) webinar, the Independent Electricity System Operator (IESO) is seeking feedback on items discussed during the webinar. The webinar presentation and recording can be accessed from the LT RFP [engagement web page](#).

Please submit feedback to engagement@ieso.ca by **March 7, 2024.**

Topic	Feedback
<p>What are some considerations if certain technology types were limited, or restricted from being developed on Ontario's prime agricultural areas?</p>	<p>By today's design standards, a typical solar project only occupies roughly 36% of the land within the fenced area. The practice of co-located solar, presents an opportunity that upholds farmers' rights and expands their economic potential. Co-location allows farmers to continue their agricultural practices on the remaining space, raising livestock or cultivating crops, underneath or between the solar panels. This innovative approach empowers farmers to not only maintain their land ownership and traditional way of life, but also diversify and increase their income streams through renewable energy generation. By allowing co-location, farmers' have the right to farm in a way that preserves their heritage while creating increased economic opportunities for a sustainable future.</p> <p>If there are serious restrictions placed on energy projects being in prime agricultural lands: farmers and communities are losing their opportunity to consider co-location. To begin with, it is established that a project cannot be considered without the consent of the municipality and the landowner.</p> <p>If a municipality determines that it is in their community's interest, they should be allowed to permit co-located renewable generation on Class 1-3 lands. Local permitting is known to allow for better land-use planning, ensuring compatibility with existing agricultural activities and ensure community acceptance. This approach empowers local communities to contribute to meeting Ontario's energy goals. Additionally, it fosters economic activities for areas. Lease agreements with farmers can provide a significant source of income, potentially stabilizing agricultural communities. By granting municipalities this authority, Ontario can unlock a win-win scenario for clean energy production, rural economic development, and responsible land management.</p>
Topic	Feedback

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<p>Given the limited amount of specialty crop areas in the province, how would diverting or restricting energy projects from these areas impact your ability to develop your energy project?</p>	
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<p>What would the impact be if there were requirements to avoid, minimize and mitigate agricultural impacts in prime agricultural areas?</p>	<p>Boralex strongly believes there is a way to protect agricultural areas in Ontario while having large-scale energy projects co-located on prime agricultural land. Specifically, the projects can be designed to allow farmers to conduct Agricultural Operations such as crop or livestock production. Alberta has recently adopted a co-location policy, which allows for the permitting of renewable generation on Class 1 and 2 lands if the proponent can demonstrate the ability for crops and/or livestock to coexist with the project. Employing a similar policy in Ontario will allow for the continuation of Agricultural Operations, the preservation of farmland and help proponents find sufficient acreage for large scale projects to help meet the IESO's procurement targets.</p> <p>In terms of policies regarding non-agricultural uses in prime agricultural areas, the Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA) displayed a map during their February 22nd presentation showing official plan land designations across Ontario. It is noted that nearly the entirety of southwestern Ontario is designated as Prime Agricultural only. Under the Provincial Policy Statement for Energy Supply Policies, large scale energy projects are discouraged in areas zoned as prime agricultural land.</p>
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<p>Based on what you heard today, do you require additional clarity on agriculture land restrictions? Why or why not?</p>	<p>Additional clarity on agriculture land restriction is required to discuss opportunities and best practices for co-location, as well as OMAFRA's position on the practice of co-location for the upcoming RFPs.</p>

General Comments/Feedback

Municipalities play a critical role in the development of renewable energy projects, and it is important that their roles and responsibilities during the RFP process are clearly communicated to them. Local planning departments and councils will need support from IESO and several ministries in the Government of Ontario to have clarity on how these proposals will fit within their existing municipal official plans and provincial planning regulations. Boralex commends the IESO on starting to engage municipalities ahead of LT2 to ask questions and provide feedback. Municipalities are eager for more information and clarity so that they can make informed and empowered decisions regarding energy projects.