

# Feedback Form

## LT2-RFP Joint Session, February 22, 2024

### Feedback Provided by:

Name: Lukas Deeg

Title: Director, Regulatory and Environmental Policy

Organization: Capital Power

Date: March 7, 2024

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](mailto:engagement@ieso.ca) by **March 7, 2024**.**

Topic	Feedback
What are some considerations if certain technology types were limited, or restricted from being developed on Ontario's prime agricultural areas?	See General Comments/Feedback.
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?	See General Comments/Feedback.
What would the impact be if there were requirements to avoid, minimize and mitigate agricultural impacts in prime agricultural areas?	See General Comments/Feedback.
Based on what you heard today, do you require additional clarity on agriculture land restrictions? Why or why not?	<p>The timelines for the LT-2 RFP are highly aggressive. Lack of clarity on land restrictions, regulations, or other requirements related to the RFP could result in unnecessary delays that could impact LT-2 participation, the qualification of good renewable projects, or timely receipt of approvals prior to meet LT-2 deadlines.</p> <p>Prospective proponents, municipalities, landowners, and other potential stakeholders would all benefit from clearer guidelines for energy development on prime agricultural land, their respective roles in determining appropriate siting, and how these requirements fit with other regulatory policies and requirements of the RFP such as municipal resolutions. A high-level roadmap that encapsulates all regulatory and RFP requirements would provide clarity to stakeholders as they work towards meeting LT-2's aggressive timelines and navigate key decisions and permitting requirements.</p>

## General Comments/Feedback

Capital Power appreciates the time taken by the IESO, MMAH, and OMAFRA to present and discuss the LT-2 RFP and their respective policies, regulations, and guidance documents.

Capital Power understands the importance of maintaining the use of prime agricultural land for agricultural purposes. However, any incremental limitations in excess of existing regulations and policies could greatly impact the success of the LT2 RFP and are unnecessary when contemplated holistically against other regulatory and RFP requirements such as landowner agreements, Indigenous consultation, and municipal support resolutions.

As stated in our January 15, 2024 submission, individual projects can impact agricultural lands differently. Wind generation requires relatively little land and allows the land to still be used for farming. Land impacts and co-location can also be managed with appropriate site planning and work with landowners for other renewable technologies, like solar. Co-locating energy projects with agricultural activity maximizes the use of land and provides farmers with a valuable non-agricultural income stream.

Broad, overarching limitations or restrictions for specific classifications of agricultural land or technology types will likely limit the development of cost-effective projects in locations near existing energy infrastructure. It will also result in a loss of potential non-agricultural income for farmers.

Capital Power submits that the appropriate use of land and potential impacts on agricultural use is most effectively determined between landowners, developers, and through current project approval processes. No further limitations, rated criteria, or other considerations needs to be considered for LT-2 or potential projects.