

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>We are concerned about the implications of additional restrictions on the siting of renewable energy projects. Ontario municipalities already have a strong mandate through which to protect agricultural land, rights that have been reaffirmed by the current government. A province-wide ban would be unnecessarily restrictive on local land-use decisions and remove authority from municipalities. Additional restrictions would further reduce the limited available land for energy and storage projects, creating challenges to meeting Ontario's economic growth and decarbonization goals. Siting projects further away from demand centres and electricity infrastructure will also increase costs to deliver electricity to end-users through electrical losses and increased capital costs and impact access to some of Ontario's most economic renewable resources, leading to increased ratepayer costs. Renewable energy projects can be an important source of secure revenue for farmers which they should not be prevented from accessing.</p> <p>Overall, less available land to develop will reduce the competition and increase PPA prices.</p>
<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>	<p>We do not support further restrictions on renewable energy and storage project siting due to the reasons above.</p>
<p>What would the impact be if there were requirements to avoid, minimize and mitigate agricultural impacts in prime agricultural areas?</p>	<p>Requirements could add to project (and therefore ratepayer) costs. We believe that the decision to develop on Prime Agricultural Areas should remain in the purview of the municipalities who designate the area. Furthermore, the Province should provide more support to municipalities through the OPO to enable local government to apply more flexibility to the siting of projects.</p>
<p>Topic</p>	<p>Feedback</p>

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Based on what you heard today, do you require additional clarity on agriculture land restrictions? Why or why not?	Yes, additional clarity on agricultural land restrictions is required as early as possible, especially on any potential additional restrictions. Project site identification is already well underway by proponents to meet the ambitious timelines of LT2.

General Comments/Feedback

In order for this next build out of renewable energy in Ontario to be successful, and to meet the supply needs identified by the IESO, the Province and the IESO need to take a truly inter-ministerial approach to electricity planning and procurement— from integrating the planning process to address land use questions while meeting electricity needs, to communicating outwardly with the public and local governments in a consistent way that supports the required outcomes. The scale of new energy and storage resource build out required in Ontario is a province-wide change management exercise that must be approached holistically. While the proponents have a large part of that responsibility with respect to approaching the siting of projects responsibly and authentically engaging with local communities, local governments, and Indigenous communities, the Government of Ontario and the IESO have a substantial role to play in creating a viable foundation for proponents to work from. Policies that take a blanket and restrictive approach to siting renewable energy and storage projects are not investor friendly and are counterproductive to meeting Ontario’s electricity supply needs in a cost effective and timely manner.

The IESO and Province should also consider the negative impact on Indigenous Rights and Title in deciding to further restrict land use for renewable energy projects, especially given that the current procurement process already places municipal rights above Indigenous rights through the municipal support resolution requirement.