

Feedback Form

Long-Term 2 RFP – June 13, 2024

Feedback Provided by:

Name: Mike Brugge

Title: Managing Partner

Organization: Ferma Energy

Email: [REDACTED]

Date: June 18, 2024

To promote transparency, feedback submitted will be posted on the Long-Term RFP engagement page unless otherwise requested by the sender. If you wish to provide confidential feedback, please mark "Confidential".

Following the LT2 RFP June 13, 2024, engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the items discussed. The presentation and recording can be accessed from the LT RFP [engagement web page](#).

Please submit feedback to engagement@ieso.ca by June 27, 2024.

Developing on Agricultural Land

Topic	Feedback
<p>Do you have any comments regarding the provision proposed within the Ministerial letter to: “Provide rated criteria points for projects that avoid prime agricultural areas.”</p>	<p>We have many comments regarding the ministerial letter to avoid prime agricultural areas.</p> <p>First, we’d like to address the Province through the MoE and other ministries. We support the intent to preserve prime agricultural areas and recognize the importance. The issue our organization is grappling with is understanding why the renewable energy industry would be the target of strict development rules while residential, commercial and industrial developments continue to remove prime agricultural areas from the province at an alarming rate. Especially when you consider the long-term ability to return the land back to it’s original use is common for the renewable energy sector and near impossible for other types of infrastructure development. Add in the fact that many renewable energy projects plant pollinator habitats or try to develop dual use projects where farming or grazing can occur around the infrastructure. The singling out of renewable energy seems unwarranted.</p> <p>We’ve personally had conversations with farmers who are relying on future renewable projects to help them keep their family farms. Without offering them alternative options, many farm owners will ultimately sell to a developer from another industry and the farmland will not actually be preserved. There must be better methods to preserve farmland than to restrict just one industry.</p> <p>Second, we’d ask the IESO to consider possible repercussions. This action may delay or preclude past ELT and LT1 awardees from receiving permits as municipalities start reviewing applications and may see these new standards. This action will also likely severely impact project competition and economics for LT2 and beyond. Many developers may have projects underway which will be abandoned.</p> <p>Lastly, if the restrictions are necessary, we’d appreciate the IESO to prepare well thought out guidance. Given the current RFP timelines, more information is needed ASAP. We’d ask the IESO to level the playing field and make the prime agricultural requirements the same across all types of generation. In rule creation, important questions for developers include: Does the entire project area need to be non-prime or is there a mix that is acceptable? Consider using Canada Land Inventory and limiting the restrictions to “prime” farmland. Maybe class 1 or classes 1 and 2. Not class 3, which is identified as having “moderately severe limitations that restrict a range of crops”. What about access roads, substations and interconnection lines?</p>

Topic	Feedback
Do you have any comments and considerations regarding the implementation of the Agricultural Impact Assessment (AIA)?	This process seems valid on the surface.

Resource Eligibility

Topic	Feedback
Repowering considerations: Do you have any feedback to share regarding other resource types opportunities for repowering/refurbishment under the LT2?	No feedback.
Hybrid considerations: Do you have any feedback to share regarding hybridized facilities under the LT2?	No feedback under the framework of this RFP.

LT2 Contract Provisions

Topic	Feedback
Performance Obligations: Do you have any feedback to share regarding minimum Imputed Production Factor thresholds or the proposed calculation approach for Non-Performance Charges?	No feedback.
Excess Deemed Market Revenues: Do you have any comments regarding the percentage of the negative Grid Reliability Payment that is to be paid back?	No feedback.

General Comments/Feedback