

# Feedback Form

## Long-Term 2 RFP – September 12, 2024

### Feedback Provided by:

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Organization: Ontario Rivers Alliance

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Date: 27 September 2024

Following the LT2 RFP September 12, 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 [Long-Term RFP \(ieso.ca\)](#).

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 “Yes” below: **No, I’m comfortable with publishing to the IESO web page.**

- Yes – there is confidential information, do not post**
- No – comfortable to publish to the IESO web page**

**Please submit feedback to [engagement@ieso.ca](mailto:engagement@ieso.ca) by September 27, 2024.**

## LT2 RFP Deliverability Guidance – Update

Topic	Feedback
Do you have any feedback to share regarding the updated Preliminary Connection Guidance document?	No
Do you have any feedback to share on the procedure to request access to the transmission system map or process to request pre-submission consultations?	No
Do you have any feedback on the types of information that you would like to see in the LT2 Capacity RFP Guidance Document?	No

## LT2 RFP Design – Policy Considerations

Topic	Feedback
Do you have any feedback to share on the policy considerations outlined in the August 29, 2024, letter from the Minister of Energy and Electrification to the IESO?	See my comments below.

## Draft LT2 Energy RFP and Contract

Topic	Feedback
Do you have any feedback regarding the recently posted LT2(e) RFP?	See my comments below.
Do you have any feedback regarding the recently posted second version of the LT2(e) Contract?	No
Do you have any feedback to share on the proposed Rated Criteria for the LT2(e) RFP?	No

Topic	Feedback
<p>Do you have any feedback to share on the proposed mandatory requirements for the LT2(e) RFP, including Municipal and Indigenous Support Resolutions requirements as well as requirements for siting projects on Crown Land?</p>	<p>The Ontario Rivers Alliance supports the requirement for Municipal and Indigenous support resolutions; however, there is much more to learn about the project before its final approval by the Minister of Environment. There must also be a process for a Municipality or Indigenous community to withdraw support if a proponent is not forthcoming with truthful and transparent about potential impact that could result from the proposed project.</p> <p>Our experience throughout the last surge of new hydroelectric proposals, from 2010 to 2016, was that in order to gain approval, proponents communicating with municipalities and the public tend to skip and ignore the potential negative impacts of hydroelectric projects with the sole focus on its benefits. The benefits and the negative impacts are very well understood, but often ignored by the proponents.</p>
<p>Do you have any feedback to share on the Indigenous and Community Engagement requirements for the LT2(e) RFP?</p>	<p>See above.</p>

## Key Themes from Recent Stakeholder Feedback

Topic	Feedback
<p>Do you have any feedback to share on the IESO responses to recent stakeholder feedback?</p>	<p>The IESO has ignored all of ORA’s previous credible arguments about the lack of wisdom in building more hydroelectric dams with reservoirs that will spew out methane for the next 100 years or more – see my comments below:</p>

## General Comments/Feedback

Hydropower is not a pathway to decarbonization! Claims that hydroelectric with reservoirs are non-emitting, low-emitting, clean or renewable is clearly DISINFORMATION! Small and large hydropower rely on reservoirs to generate power during peak demand.

Over two decades of independent peer-reviewed studies have reported that hydropower and its reservoirs emit significant and ongoing greenhouse gas emissions, most notably methane, for the full life cycle of the dam.

Hydropower proponents claim their dams will last for 100 years or more, which means they will emit methane daily into the atmosphere over those 100 years. There are currently several very old facilities being given a new lease on life with major upgrades and repairs. This presents a major problem with climate change because there are no up-front dam decommissioning provisions required to allow for the removal of these dams when they become unsafe or damaging to freshwater habitats and aquatic life.

On the other hand, building a true run-of-river facility is often not cost-effective on smaller rivers because of the high cost of construction and the small amount of power that would be produced as a result of low and unreliable flows – as low as 15 to 30% of Installed Capacity, according to the IESO's own 2015 report<sup>1</sup>. The daily, seasonal and annual variations of small hydro operations are intermittent and, therefore, unreliable because they peak during the high flows of spring when power is in low demand and produce at its lowest during the hot summer months when consumption and demand are highest. During the low flow season of summer or during drought conditions, many true run-of-river and even some peaking facilities, especially on smaller rivers, cannot operate efficiently and often have to be shut down.

To further highlight this point, in 2014 an analysis was conducted by the Ontario Power Authority to determine the best means of connection of remote First Nation communities and to enable forecasted growth to the Ring of Fire. It reported, "*Northern hydroelectric generation is an energy limited resource known to have significantly reduced output and availability during drought conditions of the river system supplying these generating units.*"<sup>2</sup> The IESO should reread its own reports. At the very least, a cost/benefit analysis should be required for any potential new hydropower project to determine whether these types of projects are environmentally and/or economically viable.

Hydropower is well known for the significant and ongoing adverse environmental effects resulting from its impoundments, diversions, and peaking operations. The collateral damage caused by hydroelectric has been well documented for decades, including the loss and serious decline in migratory fish species, declining biodiversity, impaired water quality, and the elevation of mercury concentrations in fish tissue.

We are already seeing the damaging effects of climate change on our lakes and rivers. Many rivers around the world are drying up, and climate scientists admit that we are in uncharted territory as far as predictions of what could come next.

Unfortunately, the hydropower industry has been extremely negligent over the last 100 years. There are 225 hydroelectric facilities in the province of Ontario, but only 2 have provided effective fish passage. In addition, none of these 225 hydropower facilities have provided upfront dollars to decommission the dam once they are required to be removed to further reduce GHG emissions to save our planet.

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<sup>1</sup> *North of Dryden Integrated Regional Resource Plan – January 27, 2015, by OPA/IESO. P-56 & 124. Online: <http://www.noma.on.ca/upload/documents/north-of-dryden-report-2015-01-27.pdf>*

<sup>2</sup> *Abid.*

In addition, the Ontario Waterpower Association, responsible for the Class Environmental Assessment for Waterpower, has effectively lobbied for the removal of all assurances that the public will be consulted on new and upgraded waterpower facility projects in Ontario. This has removed the public's assurance of the ability to provide important recommendations to help improve and mitigate some of the more harmful effects of these potentially damaging projects!

In summary, waterpower, whether large or small, is risky in these uncertain times and will have numerous ongoing negative environmental effects, which will have serious implications for other essential land and water uses within the watershed.

IESO staff could not make a firm statement or decision in the engagement session on whether some hydroelectric procurements would be allowed in the December LT2 RFP.

Therefore, based on ORA's rationale noted above, we strongly recommend that no new hydroelectric procurements be allowed in the LT2 RFP.

Respectfully,

A handwritten signature in cursive script, appearing to read "L. Heron", with a horizontal line extending to the right.

Linda Heron  
Chair, Ontario Rivers Alliance  
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