

Feedback Form

Long-Term 2 RFP – September 12, 2024

Feedback Provided by:

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Date: September 20, 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 \(ieso.ca\)](https://www.ieso.ca/Long-Term-RFP).

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:

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

Please submit feedback to 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?	

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?	

Draft LT2 Energy RFP and Contract

Topic	Feedback
Do you have any feedback regarding the recently posted LT2(e) RFP?	
Do you have any feedback regarding the recently posted second version of the LT2(e) Contract?	
Do you have any feedback to share on the proposed Rated Criteria for the LT2(e) RFP?	

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>We agree with the spokesperson for the Confederacy of Haudenosaunee Chiefs who alleged that the entire RFP process is in violation of Section 35 of the Constitution, i.e., the Duty to Consult. We believe this issue should be thoroughly discussed and resolved. There was an example years ago related to a project planned for Dutton Dunwich in which the proponent received points for involving a First Nation that was very distant, while the First Nation on whose traditional land the project was to be built, was ignored. And years previous, a project was proposed in the Powassan area, also supported by a First Nations community hundreds of kilometres distant. In that case, the local First Nations protested the absence of consultation, stated they were not in support of the project, and the proposal was withdrawn.</p> <p>We are concerned about the appropriateness of awarding points for indigenous support when there is no requirement for that support to be directly related to the history and of indigenous people, on whose traditional land a project may be proposed.</p> <p>Moreover, we also agree with the assertion that Indigenous people should be represented in the approval process.</p>
<p>Do you have any feedback to share on the Indigenous and Community Engagement requirements for the LT2(e) RFP?</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>	

General Comments/Feedback

We remain concerned about statements about a “diverse” power supply in the absence of any cost-benefit analysis. While the policy is to be “technology agnostic”, surely there is a duty to make decisions based on cost-effectiveness, reliability, and actual benefits to the people of Ontario? We call attention to the recently released report titled “Chasing the Wind,” prepared by economist Edgardo Sepulveda, which is the first cost-benefit analysis done for wind power specifically in Ontario (despite the fact that several Auditors General have stated cost-benefit analysis should be done for wind power). His findings were that the costs of wind power (billions each year) to taxpayers are **not justified** by any benefits for climate change, environment, or the goal to build a reliable, affordable supply of power to Ontario.

We are also concerned about the risk to prime agricultural land in Ontario. If the benefits of wind power are minimal, we are concerned that the loss of prime farmland is a critical long-term mistake, and goes against the wishes of the public to ensure a stable, secure local food supply.

We also remain concerned that there have been no changes to regulations for setbacks between industrial wind power sites and homes as well as other land uses, or changes to noise regulations despite the thousands of noise complaints the environment ministry has on file, 2006 to present day.

Also unresolved is the issue of impact to the aquifer in North Kent, Chatham-Kent, a situation so serious that Council wrote to the Ontario government in May of 2023---no response has been received as far as we know, and none of the actions requested (more water testing) have been done. The lack of regulatory review and update is often cited by municipalities who already have wind turbines, who in turn feel they have no choice but to become Unwilling Hosts to new wind power sites.