

# Feedback Form

## Long-Term 2 RFP – November 21, 2024

### Feedback Provided by:

Name: Tom Allwood

Title: Chairman

Organization: Multi-Municipal Energy Working Group

Email: [Click or tap here to enter text.](#)

Date: December 6, 2024

Following the LT2 RFP November 21, 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](#).

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](mailto:engagement@ieso.ca) by December 6, 2024.**


## Agricultural Impact Assessment Process

<b>IESO Presentation</b>	<b>Feedback</b>
Do you have any comments for the IESO to consider regarding the timing of the AIA requirement in the LT2 RFP and LT2 Contract	
<b>OMAFRA Presentation</b>	<b>Feedback</b>
Are there any specific aspects outlined in the session that you would like further clarification on?	
Is there any additional information related to agricultural considerations that would be helpful?	

### General Comments/Feedback

See attached letter summarizing concerns.

**MULTI-MUNICIPAL ENERGY WORKING GROUP**  
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December 6, 2024

IESO Community Engagement

Via email: [engagement@IESO.ca](mailto:engagement@IESO.ca)

The Multi-Municipal Energy Working Group (MMEWG) is a municipal committee that was formed in 2009 to deal with the issues created for municipalities by the Green Energy Act which imposed a number of wind turbine projects on our communities. As the program expanded, residents affected by their operation started the MMEWG for assistance in solving problems that were not being addressed by the Ministry of Environment, Conservation and Parks. The Ministry's District Staff along with other experts were invited to make presentations to the working group. When energy storage systems became an issue in member municipalities, the mandate of the group was expanded.

The MMEWG has shared the information gathered with local MPP's as well as other municipalities involved with these issues. In this context, we have tried to provide feedback to the IESO on proposals being considered. Originally a meeting was scheduled for early July, but this was cancelled by the IESO at the last minute. It took some time for a meeting to be rescheduled for December 5. Again, the IESO cancelled the meeting at the last minute.

Given the deadline for responses related to the LT 2 RFP is December 6, we decided that it was appropriate to formally table this input to the IESO so that it could be considered as part of this process.

As municipal leaders, we are mandated by the *Municipal Act* to provide measures necessary for the health, safety and well-being of citizens within our jurisdiction. This mandate is of prime importance in developing our responses to energy projects in our communities and drives the following comments.

**Setbacks** - It is clear from the feedback from our residents that the current setbacks between wind turbines and residents is not sufficient as a significant number of our residents living close to the turbines have identified irritation and health impacts. Details of these issues were also provided to the MECP and the project operator through formal complaints under the process set out in the Renewable Energy Approvals for the projects. There

has been virtually no response to these concerns.

The derived 550 metre setback was based on audible turbine sound output of early 2000's. In response to this situation, other jurisdictions have increased required setbacks. Larger turbines currently being used also have greater low frequency component and the setback needs to be based on the full turbine sound power profile.

Municipalities know that current setbacks do not protect residents and are resisting new installations until they are fixed. While setbacks are within the authority of the MECP, it would be to the benefit of the IESO to get these changed. Otherwise, it will find very limited interest in hosting wind turbine projects.

**Protection for Emergency Situations** - Similarly setbacks for tower collapse remain insufficient. The current blade length plus 10 metres requirement is not a strong enough protective measure for existing projects, let alone repowered turbines on existing footprints. Setbacks for ice throw are also insufficient, as the blade length plus 10 metre setback is less than the ice throw distance witnessed in Ontario. Ontario has witnessed turbine fires and flaming debris on the ground at 200 metres, while the setback was 50 metres. A Ministry review failed to recommend industry standard protective barriers for fire suppression in wind turbines despite examples of fires in similar turbines.

**Contract Extensions** - Extending life based on approvals granted 20 years ago for regulations that are not even within today's inadequate regulations should not be a foregone conclusion. The project's owner's record in responding to resident's complaints and the results of noise audits need to be reviewed as they will point to problems that need to be addressed. We've heard from citizens impacted in those communities, such as Kingsbridge 1, Acciona Ripley and Enbridge Underwood will come up for extension soon. Before any contract extension is granted, the IESO needs to confirm with MECP that these projects are operating within the noise limits. These discussions need to be open and transparent to residents involving at least one public meeting.

**Municipal Support Requirement** - The requirement for municipal support resolutions to be provided for all energy projects is an important component of the IESO's RFP processes. The current documentation around the LT2 process provides no direction to participants on how they should approach beyond a requirement to notify the municipality. While municipalities need the ability add additional requirements, additional direction on the processes to be used to request municipal direction are required. The current absence of direction is open to abuse by participants in the process.

The IESO needs to provide basic guidance on the steps that RFP participants should be taking and make arrangements for this information

to be shared with all municipalities in the province. This should not preclude them from establishing additional requirements. Municipalities provided some good input on a multi-step in the webinar of November 13 that the IESO should adopt. It should be noted that formal notices of projects should be directed to the Clerk of the lower tier municipality. This individual is responsible for ensuring that the Council and the appropriate members of staff are advised of the initiative.

**Agricultural Impact Assessment** - Current instructions for preparation of Agricultural Impact Assessments need updating as they do not apply to energy projects. The most important change will be the instructions for assessing the land area used in the context of the "limited area" requirement in the Provincial Policy Statement related to wind turbine and BESS projects in prime agricultural areas. The definition of the study area needs to include the full area affected by the project. In addition, plans to address well issues, fire safety, municipal/farm drainage and stray voltage.

### **Decommissioning Projects**

The decommissioning report as defined for Regulation 359/09 has been a concern for host municipalities throughout the life of the Green Energy Project. It was seen as a boiler plate exercise which did not address key issues involved in the decommissioning process. Some municipalities have negotiated separate arrangements with the proponent during the permitting process.

Continuing with a process where a plan is drafted by the proponent and approved by MECP with no input or sign-off from the affected municipality will not be acceptable. Projects are constantly flipped and there needs to be a process to ensure that the original applicant either continues to be responsible or where new owners formally take on decommissioning responsibilities.

**Unwilling Host Municipalities** – A substantial number of municipalities across Ontario have declared themselves to be "Unwilling Hosts" to new wind turbine projects. In response to actions by the IESO, some new municipalities have added their names to this list.

Even though the IESO is aware of these municipalities, the information does not appear to have been provided to participants in your RFP process as prospecting continues in Unwilling Host communities. The issue was specifically raised by the Deputy Mayor of Southgate in one of the webinars.

**Guidance on BESS safety** - The guidance provided by Hydro One on setbacks needed to protect their infrastructure from fires in BESS projects provides good direction in their context. The guidance from the Ontario Fire Marshall is inadequate for the wider issues, and since it seems to meet the requirements of the IESO, municipalities will have to follow up with the Fire Marshall's office to get their direction on setbacks and onsite facility requirements. Based on the tracking of responses to real emergency situations with energy storage situations, the MMEWG is recommending that setbacks of 800 metres are required.

Representatives of the MMEWG look forward to a fulsome discussion on these important factors with the IESO and relevant Ministries as proposed by IESO

representatives and await the rescheduling of the cancelled meetings noted earlier in this correspondence. We anticipate that discussion taking place in the not-so-distant future.

Warm Regards,



p.p.

Tom Allwood,  
Chair, Multi-Municipal Energy Working Group  
Councillor, Municipality of Grey Highlands

cc.

Hon. Stephan Lecce, Minister of Energy and Electrification  
Hon. Lisa Thompson, Minister of Rural Affairs and MPP for Huron-Bruce  
Rick Byers, MPP Bruce-Grey Owen Sound