

IESO Engagement

From: Long Term RFP
Sent: September 30, 2022 2:52 PM
To: IESO Engagement
Subject: FW: My Comment #2 re: September 30'22 Feedback Due Date re Long-Term RFP

Please see attached. This feedback was sent to the LT inbox

From: Paula Peel
Sent: September 30, 2022 2:48 PM
To: Long Term RFP <LT.RFP@ieso.ca>
Cc: Todd Smith <todd.smithco@pc.ola.org>; premier@ontario.ca
Subject: My Comment #2 re: September 30'22 Feedback Due Date re Long-Term RFP

To whom at the IESO this may concern:

I would like to comment on your proposal to bring back the rated criteria points system used by the former Liberal government as a basis for the approval process for wind power projects: i.e., "The E-LT1 RFP provides Proponents with the opportunity to obtain Rated Criteria points, which will be used to more favorably position the Proposal in the E-LT1 RFP evaluation process."

Not only does it appear you are re-implementing the point system that the Liberal government used during the Green Energy Act it appears you are using the exact same rating system or one very similar to it (eg. 3 points awarded for municipal consent!)

Based on the point system you are proposing, an application may go forward in any given municipality irregardless of whether the municipality supports the proposal. In other words, proponents can achieve enough points to get to the finish line without municipal support.

As it stands, your proposal to bring back a point system undermines the strong position our government has taken from the start (and even before coming into power in 2018), that planning decisions for power projects should be in the hands of municipalities.

There are many problems when using a point system. As we all know, developers found countless ways to work the system during the years of the GEA. However if you absolutely insist on using a point system I can only suggest that you revise the system to grant municipalities VETO power. For example, on a scale between 1 and 20 points, 11 of these 20 points would be awarded for municipal support. In this way municipal support would necessarily be positioned as being a "deal-breaker."

Also, and equally importantly, the IESO needs to find a way to deter/discourage proposals for wind and solar power projects in municipalities that have declared themselves to be UNWILLING HOSTS. Developers should show some respect for the decisions of Ontario residents / municipalities but as they seem unable to do that themselves it's up to the IESO to set some firm guidelines.

As you may know, one of the most loathsome aspects of the Green Energy Act was its stripping municipalities of any say in the planning process. This was one (of many) factors that led to its being one of the most hated Acts in Ontario's recent history. I would have hoped that the IESO had learned some lessons from this in the

intervening years since the Green Energy Act was repealed but unfortunately it appears Draft E-Lt1 that this has not been the case.

Regards,
Paula Peel
Milford, ON