

IESO Engagement

From: Long Term RFP
Sent: September 30, 2022 2:53 PM
To: IESO Engagement
Subject: FW: My Comment #3 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 #3 re: September 30'22 Feedback Due Date re Long-Term RFP

The IESO's process for determining the list of qualified applicants was not transparent. What did applicants need to do in order to be regarded as a "qualified applicant"?

The IESO made no attempt to reach out to municipalities and/or to members of the public that have had direct dealings with these companies. Why were members of the public excluded from the process of determining qualified applicants?

In this regard, I encourage you to read the article below that was recently published by Wind Concerns Ontario.

Regards,
Paula Peel
Milford, ON

Robber barons and policy defiance: what is up with Ontario's IESO?

Among those firms qualifying is [wpd.AG](#) a Germany-based company that has already built several wind power projects in Ontario, including Sumac Ridge in the Kawartha Lakes area.

The company was also responsible for the hotly contested White Pines project in Prince Edward County. For various reasons, including risk to the environment and wildlife, that project went from 29 turbines to 27, then 9 and was ultimately cancelled by the Ontario

government in 2018. Residents spent over a million dollars to defend against the power project.

“Incompetence and bad actions”

Here’s is what MPP Todd Smith said about wpd on July 23, 2018, according to the record in Hansard.

“...it was just a couple of weeks ago that the major multinational corporation developing the project was charged not once, not twice, but three times by the province’s Ministry of Environment for multiple violations. That’s because, under the renewable energy approval, to protect endangered species in the area, they’re not supposed to be constructing after May 1. Now, I have news for the House: The company has been building non-stop since the middle of June, even after the government announced its intentions to legislatively terminate the project on July 10, a couple of weeks ago. They’ve had construction crews working over the weekend and trucks heading into the county at all hours to try and complete construction before this Legislature can conclude its work on Bill 2.

If members opposite wonder why I don’t fear contractual chill, it’s because the proponent in this case has **never honoured its agreements with the government of Ontario**.

This project deserves to die. It deserves to die exactly as it should die today: publicly and in front of the whole province, with the **incompetence and bad actions** of this proponent laid open for members of this House to judge.

This company, WPD, had another project killed—you may know that, a project in Collingwood—because they were erecting turbines around the aerodrome, around the airport in Collingwood. What company would be stupid enough to put 500-foot turbines in the flight path of an airport? This one. This is the kind of company that I’m talking about.

“Robber barons”

So I say to members opposite—like my friend from Toronto–Danforth; we’ve worked together seven years now on the energy file—that if any manufacturing or resource company were before this House having committed these types of infractions, three environmental violations in the space of a month, you would be on your feet every day in

question period calling for that company's head. **If any other foreign-owned multinational company were before this House, having continued construction on a project that the government had abandoned its intent to terminate, you would be here calling them robber barons.**

The WPD is erecting nine white elephants on the south shore of Prince Edward county. Calling them wind turbines should make no difference to the members opposite, but for some reason it does. And they are nine white elephants. **They will do nothing to help this province fight climate change—absolutely nothing.** Their total capacity now, after previously being 60 megawatts, is down to about 18 megawatts of power.”

That was then.

How is that in 2022, wpd is added to a list of companies “qualified” to bid on large-scale wind power projects? Especially when comments about “incompetence and bad actions” were made by the MPP who is now the Minister of Energy?

There are questions about other companies on that list, too. Several of them have had significant numbers of complaints made about noise and other Adverse Effects in violation of the Environmental Protection Act. But now, they qualify for new contracts and more taxpayer money?

And why, when it is acknowledged that wind power is ineffective in generating reliable power, is the IESO entertaining thoughts of new wind power facilities at all?

New documents echo Wynne government era

As the IESO moves quickly to launch new RFPs, it released flight of new draft documents last Friday, September 23. The Wynne and McGuinty governments used to “drop” news, decisions and documents late on Fridays when the subject was something the government knew would upset some people.

The IESO has now done it too, releasing documents including documentation of evidence of municipal support for new power projects, and community engagement requirements for proponents or power developers.

And, here's why they did the Friday sneak: the documents appear to reflect **no change whatsoever** from the Wynne government era in which wind power projects were forced on communities. Municipal governments and citizens could raise objections but in the end there was no process by which those concerns had to be regarded seriously or even get a response.

The success of a proposal was based on rated criteria of which municipal support was one, not THE ONE.

Still no way to say NO for communities?

The IESO documents made public on September 23, 2022, indicate that projects proposed in the new Long-Term RFP or LT-RFP will be rated by a number of criteria including municipal support.

That appears to conflict with Ford government policy.

The PC government has said from the beginning that it wanted municipalities to be able to say NO to new power projects. When the Green Energy Act was repealed in 2018 then Energy Minister Greg Rickford said:

“By repealing this act, we’re restoring planning decisions to municipalities that were stripped by previous government and ensuring local voices have the final say on energy projects in their communities.”

Using municipal approval as just one of a set of criteria means the municipality's wishes (and those of the, ahem, people) can be overruled, or won over by points earned in other categories.

It's not the first time the IESO has had other ideas about what the plans are. Quoting again from now Energy Minister Todd Smith in 2018, from Hansard:

“In April, I had conversations—this is important too—with the Independent Electricity System Operator regarding the potential that White Pines would be given its notice to proceed prior to the end of the election. This was in my office here at Queen’s Park as the energy critic, and while I state that there were no specific guarantees made by IESO, it

was certainly conveyed to me that the agency understood how important this project was going to be for a new government, especially should it be a Progressive Conservative government.

Construction activity seriously began near the end of the campaign, and it ramped up immediately after it concluded, when it became obvious that there would be a PC government. It was only due to work on the part of my staff, actually, that **we found out that the system operator had given NTP, notice to proceed, on the project on May 11. Do you know when that was? That was two days into the election campaign, Mr. Speaker, during the writ period—two days. That’s a clear violation of the caretaker convention that’s been in place in the province for decades, if not longer.**

If IESO didn’t grant them notice to proceed, then no one in this province, outside of Prince Edward County, would ever have heard of White Pines, and it would have been one of 749 projects that the Minister of Energy dispensed with a few weeks ago that will end up saving the people of the province of Ontario almost \$800 million in the long run.”

We think the Ford government is unaware of the IESO’s most recent end run, this time around stated government policy.

MPPs need to be informed.

Email your MPP as soon as you can (the comment period on the draft documents ends Friday September 30, a scant seven days after release) and you may also email the Energy ministry [here](#).

Wind Concerns Ontario contact@windconcernsontario.ca

In advance of the Expedited Process and the LT1 RFP, the IESO issued the Long-Term Request for Qualifications (LT1 RFQ) to establish a list of applicants with the experience and capability to successfully develop, construct and operate facilities acquired through these procurements. The LT1 RFQ is now complete, and the list of qualified applicants is available below.