

Multi Municipal Energy Working Group AGENDA

MMEWG-2025-02

Thursday, March 13, 2025, 7:00 p.m.

Virtually via Microsoft Teams

Pages

1. Meeting Details
Microsoft Teams [Need help?](#)
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Meeting ID: 218 100 652 573
Passcode: eL9cf7pw
2. Call to Order
3. New Member Introduction
Mike Pearson, Citizen Appointee from the Township of Georgian Bluffs.
4. Adoption of Agenda
5. Disclosures of Pecuniary Interest and General Nature Thereof
6. Minutes of Previous Meetings
 - 6.1 January 9, 2025 MMEWG Minutes 1
7. Business Arising from the Minutes
 - 7.1 Update on submission to OFM Re: Tara BESS - Bill Palmer 6
8. Delegations/Presentations
9. Correspondence
 - 9.1 Requiring Action
 - 9.2 For Information

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9.2.2	Notice - IESO Engagement Postponed	13
10.	Members Updates	
11.	New Business	
11.1	2025 Membership Fees	
11.2	Chair Allwood - ROMA Conference Update	
12.	Closed Session (if required)	
	Not Required.	
13.	Confirmation of Next Meeting	
14.	Adjournment	

**Multi Municipal Energy Working Group
MINUTES**

**MMEWG-2025-01
Thursday, January 9, 2025, 7:00 p.m.
Virtually via Microsoft Teams**

Members Present: Mark Davis - Municipality of Arran-Elderslie - Citizen
Appointee
Ryan Nickason - Municipality of Arran-Elderslie
Terry Mckay - Township of Chatsworth
Tom Allwood - Municipality of Grey Highlands
Dan Wickens - Municipality of Grey Highlands
Jim Hanna - Township of Huron Kinloss
Todd Dowd - Municipality of Northern Bruce Peninsula
Sue Carleton - Township of Georgians Bluffs

Others Present: Julie Hamilton - Recording Secretary
Bill Palmer - Technical Advisor

1. Meeting Details

2. Call to Order

The Chair called the meeting to order at 7:00 pm. A quorum was present.

3. Election of Chair and Vice-Chair

The Recording Secretary opened the floor for nominations for Chair.

Tom Allwood was nominated to remain as Chair. He accepted the nomination.

The Recording Secretary called a second time for nominations. None were made and nomination were closed.

Tom Allwood was appointed Chair of the Working Group for 2025.

The Recording Secretary opened the floor for nominations for Vice-Chair.

Mark Davis was nominated. He declined.

Jim Hanna was nominated. He declined.

Todd Dowd was nominated. He accepted.

The Recording Secretary called a second time for nominations. None were made and nomination were closed.

Todd Dowd was appointed Vice-Chair of the Working Group for 2025.

The Recording Secretary turned the meeting over to the Chair.

4. Adoption of Agenda

MMEWG-2025-01-09-01

Moved by: Ryan Nickason -
Municipality of Arran-
Elderslie

Seconded by: Jim Hanna - Township of
Huron Kinloss

Be It Resolved that the Multi-Municipal Energy Working Group hereby adopts the agenda of the Thursday, January 9, 2025 as distributed by the Recording Secretary.

Carried

5. Disclosures of Pecuniary Interest and General Nature Thereof

There were no disclosures made.

6. Minutes of Previous Meetings

6.1 MMEWG Minutes - November 14, 2024

MMEWG-2025-01-09-02

Moved by: Terry Mckay - Township of
Chatsworth

Seconded by: Ryan Nickason -
Municipality of Arran-
Elderslie

Be It Resolved that the Multi-Municipal Energy Working Group hereby approves the minutes of the Thursday, November 14, 2024 meeting as presented by the Recording Secretary.

Carried

7. Business Arising from the Minutes

7.1 IESO Meeting

The meeting that was to be held on December 5, 2024 was cancelled. The IESO felt that given the talking points provided, in order to facilitate a fulsome and informed discussion, they recommend including a few of the Ministries in this meeting.

A new date for the meeting has not yet been provided.

8. Delegations/Presentations

8.1 Bill Palmer - Letter to the Office of the Fire Marshal

Mr. Palmer made a presentation to the Working Group regarding a submission he made to the Office of the Fire Marshal regarding safety of the public and first responders in the event of a lithium ion BESS fire.

In his letter, he notes urgency due to the pending installation of BESS systems such as 400 MW/1600 MWh Neoen Ontario Tara BESS (formerly known as the Shift Solar Grey Owl BESS).

The letter also refers to a handbook entitled "Solar Electricity and Battery Storage Systems Safety Handbook for Firefighters" (prepared by the Canadian Renewable Energy Association (CanREA) in collaboration with the Ontario Association of Fire Chiefs (O AFC). Mr. Palmer raised concerns including the inadequate consideration of public safety related to fires in BESS facilities and that it downplays the risk faced by first responders.

Mr. Palmer also referenced findings of an EV FireSafe study, developed for the Defence Science and Technology Group of the Australian Government, Department of Defence. Findings from that study, identified the risk from lithium-ion batteries such as the 60 to 100 kWh batteries in current Tesla Electric Vehicles.

He urges the Office of the Fire Marshal to review the concerns and to give direction to the IESO and impacted municipalities before the ongoing installation of Ontario BESS facilities continues.

The Working Group thanked Mr. Palmer for his presentation.

MMEWG-2025-01-09-03

Moved by: Jim Hanna - Township of Huron Kinloss

Seconded by: Dan Wickens - Municipality of Grey Highlands

Be It Resolved that the Multi-Municipal Energy Working Group hereby receives Mr. Palmer's presentation for information.

Carried

9. Correspondence

9.1 Requiring Action

9.1.1 2025 MMEWG Meeting Calendar

MMEWG-2025-01-09-04

Moved by: Sue Carleton - Township of Georgians Bluffs

Seconded by: Terry Mckay - Township of Chatsworth

Be It Resolved that the Multi-Municipal Energy Working Group hereby approves the 2025 regular meeting schedule as presented.

Carried

9.2 For Information

MMEWG-2025-01-09-06

Moved by: Ryan Nickason - Municipality of Arran-Elderslie

Seconded by: Todd Dowd - Municipality of Northern Bruce Peninsula

Be It Resolved that the Multi-Municipal Energy Working Group hereby receives, notes and file the correspondence for information purposes.

Carried

9.2.1 December 6 2024 IESO Engagement Feedback

9.2.2 Tara BESS Open House - January 21, 2025

The Working Group discussed concerns related to the Tara BESS proposal.

MMEWG-2025-01-09-05

Moved by: Jim Hanna - Township of Huron Kinloss

Seconded by: Mark Davis - Municipality of Arran-Elderslie - Citizen Appointee

Be It Resolved that the Multi-Municipal Energy Working Group hereby directs that the presentation and materials presented by Mr. Palmer be forwarded to all member municipalities.

Carried

9.2.3 WCO letter to MECP regarding Urgent Action Needed to Wind Turbine Regulations

10. Members Updates

11. New Business

Mr. Howard noted the rules regarding projects on prime agricultural areas has potentially stalled new projects.

Chair Allwood will be attending ROMA and plans to connect with IESO representatives.

12. Closed Session (if required)

Not required.

13. Confirmation of Next Meeting

The next meeting will be March 13, 2025 at 7 p.m.

14. Adjournment

MMEWG-2025-01-09-07

Moved by: Terry McKay - Township of Chatsworth

Seconded by: Sue Carleton - Township of Georgians Bluffs

Be it Resolved that the meeting of the Multi-Municipal Energy Working Group is hereby adjourned at 8:15 p.m.

Carried

Subject Re: Ontario Fire Marshal website request.
From
To Clark, Carrie (SOLGEN) <Carrie.Clark@ontario.ca>
Cc Macdonald-Duncan, Nancy (SOLGEN) <Nancy.Macdonald-Duncan@ontario.ca>
Date 09 Feb 2025 16:56



Dear Ms. Carrie Clark,

Deputy Fire Marshal, Office of the Fire Marshal

Ministry of the Solicitor General, Ontario Public Service

Thank you for your response of Feb. 7, 2025, to the submission I filed on the OFM Website, Dec. 16, 2024, titled, "Submission for Review - Re - Safety of the Public and First Responders in the event of a Lithium Ion BESS Fire." That submission, was then resent on Dec. 17, via Nancy Duncan-Macdonald, Deputy Fire Marshal, Office of the Fire Marshal, Midhurst, in response to her request to send the submission directly to her for review so she might direct it to the appropriate division of the OFM. I mention this only since your very generic response to me about Battery Energy Storage Systems (BESS), fails to respond to any of the points raised in my submission with regard to safety to first responders or the public, and suggests reference material to me such as the UL 9540A standard, and Hydro One standard, which were already referenced in my original submission. I had to wonder if the composer of your response to me had the opportunity to actually review my submission, or if it was simply a response to the website subject heading.

While it is encouraging to receive a respectful response from a Ministry spokesperson, I wondered if it might be useful for me in acknowledgement of your reply, to respond to a question that may be in your mind, "Why is this Mr. Palmer writing to the Office of the Fire Marshal about BESS? Why does he care?"

I had signed my letter only, William Palmer, P. Eng., but that generic designation gives little background. My career as an Professional Engineer first with Noranda Mines, then with Ontario Hydro Nuclear, and it's successor organizations, Ontario Power Generation, and Bruce Power, followed by post retirement technical advisory service to municipalities and professional associations provided a special opportunity:

- responsible for the replacement of a station battery (the precursor of a BESS) at Noranda Mines Geco Division, and other electrical projects there (in compliance with the Electrical Safety Code)
- responsible for commissioning gas turbine standby generators (including their fire protection and battery banks), the 500 kV switchyard, and for cable fire protection at Bruce Nuclear Generating Station A
- on shift experience as authorized nuclear shift supervisor, responsible for safety of all Bruce A plant staff, and for public safety from the entire station on a shift basis
- responsible for training and safety of all Bruce A station staff, providing the opportunity to be suited up in a bunker suit, on a hose line before the BNPD fire practice site (while I'm not qualified a a fire fighter, it gave a healthy respect for those whose profession it is - including cousins in both Ontario and the United Kingdom)
- experience dealing with regulators regarding public safety (reactor safety) (including time acting as site Nuclear Safety Manager, accompanying Site Vice President, to explain Bruce site Nuclear Safety issues to the corporate Chief Nuclear Officer)
- later responsibility for Bruce site Operations Performance Assurance (including reviews of station battery performance), then for training staff performing public safety risk assessment. and for verification of that risk assessment to justify Bruce A restart
- then following retirement from Bruce Power, acting as technical advisor to Multi Municipal Energy Working Group, and being qualified as expert witness before Review Tribunals on the subjects of noise, public safety and risk for energy systems in Ontario and the state of Ohio in the USA

You may legitimately ask, why am I not satisfied with adopting hobbies of golf, curling, or pickleball in retirement, and instead write to regulatory authorities such as the Ontario Fire Marshall, raising concerns with public safety issues related to energy projects? Why have I been requested to prepare and deliver technical sessions on energy projects before groups such as the Ontario Society of Professional Engineers, the Ontario Branch of the International Association of Electrical Inspectors, the Canadian Acoustical Association, the Acoustical Society of America, or the International Wind Turbine Noise Conferences sponsored by the Institute of Noise Control Engineers? I suppose the reason is two fold. First, I have an obligation as a Professional Engineer "to report a situation that an engineer believes may endanger the safety or welfare of the public." That is easy to state, and is a legal obligation. The second reason is harder to explain in a politically correct manner, but is the real underlying reason. What can I say when the lady who lives at 37 Concession 4, Arran-Elderslie, calls me to express her concern that the Tara BESS is being built right beside her home, which was severed from the farm siting the BESS, where she has lived for 47 years? She explains that she filed her concerns with the municipality, and the planning board, but no one is willing to listen. All I can answer, is that I will state the facts, professionally to the best of my knowledge, and as honestly as I can, before the responsible authority. While it may not be politically correct to say so, in my personal life, I choose to follow the guidance of Jesus Christ, who in Luke 10: Verse 37 tells those who have the ability to do so, to show mercy to those in need. I apologize if this may be offensive, as that is not the intent, but it is the real reason why I am approaching you, as the responsible authority based on my professional knowledge and experience. This is even though it puts me in the unenviable position of being "opposed" to a Minister of Energy Directive and IESO plans to establish many BESS systems, with the IESO then going on to explain that protection of fire fighters is assured by the "Solar Energy and Battery Storage Systems Safety Handbook" prepared by CanREA, the proponent for BESS. I wrote to you as the responsible authority, to outline my concerns with the statement that protection of firefighters and the public is assured.

My submission tries to explain why the 60 metre setback identified in the Ontario Hydro Standard designed to protect 115 kV Right of Way are inappropriate for public safety. I can certainly not explain to any person that if Hydro One sets a 60 metre setback from a power corridor for which it has usual redundancy, that it is an appropriate setback from their home, by explaining that they are "redundant" to society, as there are other persons who can fill their place. NFPA 855 is even worse, establishing a 30.6 metre setback from BESS to residential homes, although I did not even identify that inadequate "standard" in my submission. Similarly my submission explained why UL 9540A is inadequate as it certifies a lithium ion battery that can pass a charge - discharge - charge - discharge (2 cycle) test, while multiple peer reviewed papers show that Lithium Ion batteries fail not after 2 cycles, but after repeated cycles, and in particular when routinely charged to full capacity as utility BESS will be. Neither does Bulletin 64-7-2 of the Ontario Electrical Safety Code regarding the Installation and Approval of Energy Storage Systems assure public safety.

I hope my response explains the "why" I filed my submission with the Office of the Fire Marshall, as the responsible authority for the Fire Code, thus, "to govern standards for reducing the risk of, or consequences of, a fire that would seriously endanger the health or safety of any person "and may provide grounds for you to again review my full submission.

With respect,

William K.G. Palmer P. Eng.

On 07 Feb 2025 14:02, Clark, Carrie (SOLGEN) wrote:

Dear Mr. Palmer,

Thank you for your correspondence regarding fire safety concerns related to Battery Energy Storage Systems.

In Ontario, the installation of Battery Energy Storage Systems (BESS) is regulated by the Ontario Electrical Safety Code (OESC). Prior to commissioning, BESS installations must be inspected and approved by the Electrical Safety Authority, the organization responsible for enforcing compliance with the OESC.

Under the OESC, BESS installations are required to conform with provisions of UL 9540 (Standard for Safety for Energy Storage Systems and Equipment) and UL 9540A (Standard for Safety Test Method for Evaluating Thermal Runaway Fire Propagation in Battery Energy Storage Systems), standards that address the risks of thermal runaway and other fire hazards associated with BESS technology.

Additional requirements for BESS installations have also been established by Hydro One as detailed in the [BESS Fire Protection Risk & Response Assessment Standard](#). These requirements must be met prior to connecting BESS installations to transmission lines owned by Hydro One.

While BESS projects are not subject to the Ontario Fire Code, fire departments play a critical role in the development of firefighting strategies and emergency response plans, as well as community risk assessments required under [O. Reg. 378/18 \(Community Risk Assessments\)](#). Therefore, consultation and collaboration between BESS project developers and local fire departments is needed to ensure the safety of both the community and firefighters in the event of a fire at a BESS facility.

The Office of the Fire Marshal recognizes that Battery Energy Storage Systems are a rapidly expanding area of technology and is exploring options for the development of guidance materials to support fire services in their role respecting BESS projects within their communities. It is anticipated that this work will be undertaken in partnership with stakeholders, regulators, and industry experts in the coming months and when available, will be announced to Ontario fire services through a Fire Marshal's Communique available at the following link: [Office of the Fire Marshal's communiqués and bulletins | ontario.ca](#).

We thank you for bringing this matter to our attention and for your interest in fire safety.

Carrie

Carrie Clark

Deputy Fire Marshal | Office of the Fire Marshal

Ministry of the Solicitor General | Ontario Public Service

249-288-6539 | carrie.clark@ontario.ca

Office of the Fire Marshal 

Working together towards making Ontario a fire safe place to live, work and play.

Feedback Form

Long-Term 2 RFP – December 12, 2024

Feedback Provided by:

Name: Warren Howard

Title: Retired

Organization: Consultant

Email: howardwarr@aol.com

Date: Click or tap here to enter text.

Following the LT2 RFP December 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 [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 by January 10, 2024.

Overview of directive and LT2 updates

Question	Feedback
<ul style="list-style-type: none"> Do you have any comments for the IESO regarding the proposed targets for the first submission window and/or the range of targets proposed for future windows? 	
<ul style="list-style-type: none"> Do you have any comments for the IESO to consider regarding the proposed timeline for the first submission window? 	

LT2 (c) – High Level Overview of RFP and Contract

Question	Feedback
<ul style="list-style-type: none"> Do you have any comments for the IESO regarding the newly proposed rated criteria related to duration? 	

LT2(e) and LT2(c) RFPs and Contracts

Question	Feedback
<ul style="list-style-type: none"> Do you have any comments related to the treatment of support confirmations across windows? 	
<ul style="list-style-type: none"> Do you have any comments related to the proposed new requirement for evidencing that a project is on Unincorporated Territory? 	
<ul style="list-style-type: none"> Do you have any comments regarding the proposed early COD multiplier? 	

Deliverability Guidance

Question	Feedback
Do you have any comments around the Deliverability for Windowed Approach?	
Do you have any general comments you would like to share around the deliverability guidance or test methodology information presented for window 1?	

General Comments/Feedback

Roof-Mounted Solar in Prime Agricultural Areas

The statement by the IESO in the December 12 webinar that roof-mounted solar installations are allowed in prime agricultural areas means that the instructions for completing the AIA will need to provide clarity for proponents and municipalities on how the “limited area” requirements for energy projects in the Provincial Policy Statement will be applied to these units.

It is assumed that the solar panels could be added to existing buildings, if structurally possible but new buildings constructed for the purpose of supporting solar panels should not be allowed.

It is also assumed that the total land area occupied by buildings with solar panels on the roof should not exceed the size limitations set out in the AIA for other energy generating and storage facilities. Extensive development of “storage” buildings with roof-mounted solar panels on prime agricultural areas would not be consistent with the Ministerial directive limited the use of this land for solar-generation facilities.

These matters will have to be clarified in the instructions provided for completion of the Agricultural Impact Assessment.

Scope of Alternate Site Assessments

The modification suggested for the PPA requirement for the analysis of alternate sites when proponents are proposing development in Prime Agricultural areas will not satisfy the PPS requirements for analysis of alternate locations.

The key drivers of this analysis for a wind project should be the strength of the wind resource and the ability to arrange a connection to the Hydro One infrastructure. Neither of these requirements limit the site to a single municipality. This means that if all sites within a municipality require the use of a prime agricultural area, then the PPA requirement would mean that sites in other municipalities should be considered.

Proper analysis would require would require that alternate sites in other municipalities with similar wind resources and access to the grid be considered if the impact on prime agricultural areas can be avoided.

To allow proponents to focus only on one municipality makes a mockery of the Minister's direction relative compliance with the PPS.

Identification of Correct Planning Authorities

A variety of arrangements to provide planning services to a specific area varies exist between municipalities. For some, the appropriate contact is the lower tier municipality while the appropriate contact is others will be in the upper tier municipality. In some cases, planning resources are shared between municipalities.

Having proponents contact planning authorities directly will cause confusion unless the IESO also provides an index of how planning activities are handled in all municipalities. This confusion can also lead to delays in ensuring prompt response to the request.

It would be more straight-forward to have proponents contact the Clerk of the lower tier municipality involved. This individual is in a position direct the proponent to the correct individual to proper respond to the proponent on behalf of the municipality.

From: [Long Term RFP 2](#)
Cc: [Long Term RFP 2](#)
Subject: LT2 RFP: Engagement Postponed, Change to Proposal Submission Deadlines & IESO Response to Stakeholder Feedback Document Posted
Date: January 27, 2025 2:22:49 PM

Hello,

You are receiving this email as a subscriber to the IESO's [Long-Term RFP mailing list](#), or as an attendee of a recent LT2 RFP engagement webinar.

The IESO is providing the following updates:

1. The LT2 RFP engagement scheduled for Tuesday January 28, 2025 has been postponed and will be rescheduled at a later date.

With a provincial election expected to be called early this week, the IESO will be adhering to established caretaker principles for government agencies and will be pausing external engagements until the election has concluded. This means stakeholder and community engagements scheduled during this period will be postponed and external communications will be limited.

During this time, we are still here to help. If you have any questions, please reach out to engagement@ieso.ca.

2. As a result of stakeholder feedback, the Proposal Submission Deadlines for the LT2(e-1) RFP and the LT2(c-1) RFP have been extended to the following dates:

Proposal Submission Deadline	
LT2(e-1) RFP	October 16, 2025
LT2(c-1) RFP	December 18, 2025

This is intended to provide proponents with additional time to meaningfully engage with municipalities and Indigenous communities. As was noted in the response to feedback document, stakeholders have indicated to the IESO that an extension would result in more submissions, enhancing competitiveness and lower prices for ratepayers.

3. The IESO has posted the following documents to the [Long-Term RFP Engagements](#) webpage:

- IESO Response to Stakeholder Feedback

This is the IESO's response to feedback received for the LT2 RFP Engagement Webinar held on December 12, 2024.

Please continue to monitor the [Long-Term RFP Engagements](#) webpage for information on upcoming engagements on the LT2 RFPs.

Please visit the [Long-Term 2 RFP](#) webpage for the latest information on the LT2 RFPs, or email us at LT2.RFP@ieso.ca with any questions you may have.

Regards,

Long-Term RFP Procurement Team
 Independent Electricity System Operator (IESO)
 Web Page: [Long-Term 2 RFP](#)

This communication is being sent to you because you have subscribed to the Long-Term RFPs distribution list. Unsubscribe [here](#).