Multi Municipal Energy Working Group
AGENDA

MMEWG-2025-03
Thursday, May 8, 2025, 7:00 p.m.
Virtually via Microsoft Teams

Pages

1. Meeting Details

   Microsoft Teams Need help?

   Join the meeting now

   Meeting ID: 217 749 708 700

   Passcode: Lh7Ri7Vv

2. Call to Order

3. Adoption of Agenda

4. Disclosures of Pecuniary Interest and General Nature Thereof

5. Minutes of Previous Meetings

   5.1 MMEWG Minutes - March 13, 2025 1

6. Business Arising from the Minutes

   6.1 Bill Palmer - Verbal Update on Grey Sauble Conservation Authority

   6.2 MPP Paul Vickers - Correspondence 7

   Tentative attendance confirmed for the meeting of November 13, 2025.

7. Delegations/Presentations

8. Correspondence

   8.1 Requiring Action

   8.2 For Information

9. Members Updates

10. New Business

11. Closed Session (if required)

    Not Required

12. Confirmation of Next Meeting

    September 11, 2025 7:00 p.m. via Microsoft Teams

    November 13, 2025 7:00 p.m. via Microsoft Teams

13. Adjournment

Multi Municipal Energy Working Group

MINUTES

MMEWG-2025-02
Thursday, March 13, 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
Scott Mackey - Township of Chatsworth
Tom Allwood - Municipality of Grey Highlands
Dan Wickens - Municipality of Grey Highlands
Don Murray - Township of Huron Kinloss
Sue Carleton - Township of Georgians Bluffs
Mike Pearson, Township of Georgian Bluffs - Citizen Appointee

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 7:01 pm. A quorum was present.

3. New Member Introduction

Chair Allwood welcomed new member Mike Pearson, Citizen Appointee from the Township of Georgian Bluffs.

Mr. Pearson introduced himself as a resident of Georgian Bluffs. He is a practicing Professional Engineer who works in the field of contaminated properties. He looks forward to learning from the Working Group.

4. Adoption of Agenda

MMWEG-2025-03-13-01

Moved by: Ryan Nickason - Municipality of Arran-Elderslie

Seconded by: Scott Mackey - Township of Chatsworth

THAT the Multi-Municipal Energy Working Group hereby adopts the agenda of the Thursday, March 13, 2025, as distributed by the Recording Secretary.

Carried

5. Disclosures of Pecuniary Interest and General Nature Thereof

None.

6. Minutes of Previous Meetings

6.1 January 9, 2025, MMEWG Minutes

MMWEG-2025-03-13-02

Moved by: Sue Carleton - Township of Georgians Bluffs

Seconded by: Ryan Nickason - Municipality of Arran-Elderslie

THAT the Multi-Municipal Energy Working Group hereby approves the minutes of the Thursday, January 9, 2025 meeting as presented by the Recording Secretary.

Carried

7. Business Arising from the Minutes

7.1 Update on submission to OFM Re: Tara BESS - Bill Palmer

Mr. Palmer provided the members with a summary of the response that he received from the Deputy Fire Marshall regarding a submission made in December 2024. Following the response, he provided an additional response which is included in the agenda package, and no further correspondence has taken place.

The Working Group recognizes the need to continue advocate to the Fire Marshall's Office for more definitive definitions, setbacks and other safety parameters surrounding BESS installations.

Mr. Palmer provided some current photos of the proposed site which shows the current site conditions and flooding.

MMEWG-2025-03-13-03

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

Seconded by: Dan Wickens - Municipality of Grey Highlands

THAT the Multi-Municipal Energy Working Group hereby receives for information agenda item, 7.1 - Update of submission to OFM Re: Tara BESS.

Carried

8. Delegations/Presentations

9. Correspondence

9.1 Requiring Action

9.2 For Information

Mr. Howard provided a brief overview of the feedback he submitted back in December.

MMEWG-2025-03-13-04

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

Seconded by: Dan Wickens - Municipality of Grey Highlands

THAT the Multi-Municipal Energy Working Group hereby accepts the correspondence for information purposes.

Carried

9.2.1 Warren Howard - IESO Feedback Submission

9.2.2 Notice - IESO Engagement Postponed

10. Members Updates

Member Halliday attempted to join the meeting but had technical issues. He provided his update by email for the Recording Secretary to read aloud which noted that Grey Highlands wrote a bylaw and with the blessing of the fire marshal, insisted that fire suppression had to

be installed before they could turn on the system. Fire suppression systems do exist for BESS installations. Grey Highlands believed that they needed to make fire suppression happen and it did and they even got existing IWT's fitted with fire protection. Member Davis noted that the issue with the Grey Highlands Bylaw requires that the IWT be built and the goal with wind turbines then, and now with BESS is that they do not be built in our area.

Member Mackey noted that we have a new member of Parliament and suggested that Mr. Vickers be invited to an upcoming meeting of the Working Group.

MMEWG-2025-03-13-05

Moved by: Scott Mackey - Township of Chatsworth

Seconded by: Dan Wickens - Municipality of Grey Highlands

Be It Resolved that the Multi-Municipal Energy Working Group hereby directs that a welcome letter be sent to Paul Vickers welcoming him and inviting him to meet at his convenience.

Carried

11. New Business

Member Davis

11.1 2025 Membership Fees

The purpose of the fund is to cover expenses related to secretarial services as well as administrative costs, consultant costs and legal or other expert advice. The current balance in the fund is $6777.28.

MMWEG-2025-03-13-06

Moved by: Scott Mackey - Township of Chatsworth

Seconded by: Don Murray - Township of Huron Kinloss

THAT the Multi-Municipal Energy Working Group hereby maintains the current fee structure of $500.00 for a Voting Municipal Member and $400.00 for a Non-Voting Municipal Member.

Carried

11.2 Chair Allwood - ROMA Conference Update

Chair Allwood provided the group with a brief update from the ROMA Conference.

The IESO had a large presence there and had a booth, hosted a concurrent session, a lunch and learn and spoke during the preliminary program. They discussed the projected energy demand increase, community benefit agreements, municipal support resolutions and pre-engagement consultations with municipalities early in the process.

Another interesting presentation provided information on agricultural economic development which focused on the protection of prime agricultural lands and specialty crop areas. It also touched on the Agricultural Impact Assessment that must be prepared by proponents, which must be assessed by the municipality.

Chair Allwood was able to speak directly with Carla Nell and Leslie Gallinger and he noted that 1/3 of the municipalities in Ontario are currently unwilling hosts due to the ongoing issues with projects such as setbacks and fire suppression. He also noted that it was encouraging that the IESO had agreed to a meeting with the MMEWG, IESO and relevant ministries which has unfortunately been delayed.

12. Closed Session (if required)

Not Required.

13. Confirmation of Next Meeting

The next meeting will be held May 8, 2025, at 7:00 pm via Microsoft Teams.

14. Adjournment

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

Seconded by: Sue Carleton - Township of Georgians Bluffs

THAT the meeting of the Multi-Municipal Energy Working Group is hereby adjourned at 7:58 p.m.

Carried

Tom Allwood, Chair

Julie Hamilton, Recording Secretary

MULTI-MUNICIPAL ENERGY WORKING GROUP
Tom Allwood, Councillor, Grey Highlands, Chair
Jim Hanna, Deputy Mayor, Huron-Kinloss, Vice-Chair
1925 Bruce Road 10, Box 70, Chesley,On N0G 1L0
519-363-3039 Ext.105 Fax: 519-363-2203
jhamilton@arran-elderslie.ca

April 16, 2025

Mr. Paul Vickers
Bruce-Grey-Owen Sound
Progressive Conservative Party of Ontario
Suite 105B
345 8th Street E
Owen Sound, ON N4K 1L3

Dear Mr. Vickers,

On behalf of the Multi-Municipal Energy Working Group (MMEWG), I would like to congratulate you on your recent election as the Bruce-Grey-Owen Sound MPP.

The MMEWG is a dedicated group of elected officials and citizen representatives appointed by participating municipal Council's. The group originally formed in 2010 as the Multi-Municipal Wind Turbine Working Group following rising concerns surrounding safety, adverse health affects and best practises associated with industrial wind turbine projects. Through time, the group has continued to study, research and advocate for stronger measures to be put in place to combat the concerns.

As the province continues to look at ways to increase capacity and ensure sufficient supply to support the anticipated future electricity needs, new energy generation and storage facilities are being proposed throughout the province. With these proposals, comes another wave of growing concern, similar to what was seen with the introduction of industrial wind turbines. In response to the changes in the industry, the MMEWG has adjusted its mandate to include all forms of energy generation and storage infrastructure, allowing the work of the group to address a broader area of concern.

In response to the IESO's procurement process for 2,518 MW of capacity, a large number of Battery Energy Storage System (BESS) proposals were brought to the table and municipal Council's were asked to provide their approval of the facilities in the absence of fire suppression direction, minimum setback requirements and zoning regulations. The IESO has now issued a second RFP to procure another 5,000 MW and this is expected to include a large number of wind turbine proposals.

It is now, more than ever, that more research, understanding and advocacy is needed and as Municipal Leader's, we need to fully understand the implications of these proposals to ensure that we meet our mandate under the *Municipal Act, 2001,* as amended, to provide measures necessary for the health, safety and well-being of citizens within our jurisdiction.

The Multi-Municipal Energy Working Group would like to extend an invitation for you to attend one of our meetings to introduce ourselves, provide details of the key focus areas and to explore potential opportunities for collaboration to address concerns.

Our meetings are held bi-monthly by Microsoft Teams with the next meeting being held on Thursday, May 8, 2025, at 7 pm and we would welcome your attendance. Please advise if you could join us, or, alternative dates can be provided by our Recording Secretary.

Yours truly,

p.p

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

Julie Hamilton
Recording Secretary
Email: jhamilton@arran-elderslie.ca
Office Phone: 519-363-3039 ext. 105
Cellphone: 226-668-8323

MUNICIPALITY OF
ARRAN-ELDERSLIE

Policy

Section: 10. Planning and Development

Policy: Battery Energy Storage Policy

Policy By-Law: 31-2025

Date: April 28 2025 Revision:

Coverage:

This policy will govern all battery energy storage within in the administrative boundary of the Municipality of Arran-Elderslie.

Policy Statement:

Municipalities play a critical role in being central to decisions about the type and location of new infrastructure needed to support energy transition. This policy provides direction for Battery Energy Storage System projects intended to support the electrical grid.

The Municipality will consider impacts from potential land use conflicts, fire safety, agricultural operations, and environmental constraints to minimize impacts to the built and natural environments of the municipality.

Legislative Authority:

Municipal Act, 2001, Planning Act, R.S.O. 1990

Contents:

1. Definitions

Battery Energy Storage Systems (BESS)- means an energy storage system that can store and deploy generated energy, typically a group of batteries that charge (i.e. collect energy) and store electrical energy from the grid or energy generation facility and then discharge that energy at a later time to provide electricity or other grid services when needed. BESS generally consist of batteries, battery storage containers, on-site switch yard, inverters, associated interconnection transmission line, and supervisory control and data acquisition system.

The Independent Electricity Systems Operator (IESO)- means the agency that regulates and manages the flow of electricity across Ontario to ensure reliability.

Municipal Support Confirmation (MSC) - the mechanism by which the IESO

authorizes municipal governments to endorse energy projects for the purpose of making an application to the IESO in response to an RFP for an electrical generation contract. They are general in nature and do not preclude projects from having to meet municipal regulatory requirements or obtain any municipal development approvals or permits.

2. Responsibility of the Developer

That the Developer engages in pre-consultation with the Municipality and County of Bruce prior to the request for a Municipal Support Resolution.

That the Developer enters into an agreement with the Municipality to satisfy all the requirements, financial and otherwise, of the Municipality concerning the development.

That the Developer is responsible to meet all applicable code and standards that apply to BESS including but not limited to: The Planning Act, The Ontario Building Code (OBC), Ontario Electrical Safety Code (OESC), The Ontario Fire Code (OFC), National Building Code (NBCC), the Canadian Electrical Code (CE Code, Underwriters laboratories (UL) and the National Fire Protection Association (NFPA).

Notification and Public Consultation will be required as part of the process and taken into consideration in the approval process.

3. The Agreement (s)

One or more agreements shall include but not be limited to the following clauses:

Construction – shall include all requirements prior to commencing construction.

Haul Routes- shall include details on haul routes which shall be approved by the municipality and any other agency having jurisdiction.

Private Access Roads - shall include locations.

Electrical Distribution System – shall address any electrical distribution system required as part of the development including easements.

Environmental Impacts – shall meet requirements for environmental impacts mitigation and replacement plan.

Grading and Drainage – shall meet the municipal requirements and approvals.

Municipal Road Use – shall meet all municipal requirements for utilizing

municipal roads.

Operation and Maintenance – The municipality acknowledges that the operation is regulated by IESO and it is not the intent of the Municipality to attempt to regulate operations through the agreement.

The developer shall notify the municipality of all operational changes and maintenance windows.

The developer shall meet the requirements for the safe operation and maintenance of the development including fire protection and emergency response plans.

Commissioning and Decommissioning – shall include a plan for provisions related to the commissioning and decommissioning including removing all installed facilities and restoring the lands, including securities acceptable to the municipality.

Community Benefit Contribution – shall include a negotiated annual payment to the municipality to be used for community benefit projects as determined by the municipality based on the capacity, along with an annual CPI inflationary factor.

Costs – any cost incurred by the municipality with respect to the development shall be borne by the developer. The Developer shall deposit an amount as indicated in the Municipal Fees and Charges By-Law.

General Provisions – shall include all other requirements of the municipality.

Insurance – shall include any requirements the municipality may require.

Liability – shall save harmless the municipality and its representatives from all actions, causes of actions, suits, claims, cost, interest and demands whatsoever which may arise either directly or indirectly by reason of the agreement.

Noise – shall include information detailing the expected noise level and any proposed abatement measures.

Security – shall include all securities as may be required, but will include, and shall not be limited to, construction, maintenance, and decommissioning.

More detail and requirements may be included in the final agreement.

4. Site Guidelines

Council will evaluate the suitability of the location and the land use compatibility of the proposed Battery Energy Storage Facility.

Proposed developments must meet municipal regulatory requirements and obtain any municipal development approvals or permits required.

Battery Energy Storage Facilities are better suited in Industrial Areas and may be considered in Rural or Agricultural Area where they can be located on land of lower agricultural capability or ensure the continued use of prime agricultural land for farm use and minimize the loss of production farm land.

All applications are subject to land use planning applications and site plan control.

Site Provision:

	Feature	Provision Guideline
1	Minimum Setback to sensitive land uses (i.e. residential use buildings, day care, place of worship, school, library, community centre, open space or institutional use)	300 meters Subject to potential increases to that setback based on the review of plans and studies which would accompany an application for a site-specific Zoning By-law Amendment, including fire protection and emergency response plans
2	Screening	Landscape screening shall be required and compatible with the general appearance and character of the surrounding area.
3	Maximum Percentage Size Limit of the lot area depending on the zone, as well as establishing setback and screening requirements.	Agriculture Zone – 2% of the total lot area to a maximum of one hectare Rural Area – 20% Industrial Area – 20%

DEPARTMENTAL REPORT
Environmental Sustainability CCC2025-02

To: Mayor Davidson and Council
Subject: Community feedback on Wind Energy Project Procurement in Mapleton
Meeting: Regular Council Meeting - 18 Mar 2025
Department: Environmental Sustainability
Staff Contact: Martin Tamlyn, Climate Change Coordinator

RECOMMENDATION:

THAT Council receive staff report CCC2025-02 for information.

AND THAT Council resolves to remain an unwilling host at this time.

BACKGROUND INFORMATION:

At the regular council meeting on September 24, 2024, for item **9.1.3**, a report and discussion were held regarding renewable energy opportunities in the region. A renewable energy company had approached the Township expressing interest in exploring a new wind turbine energy project.

Like many other municipalities, Mapleton declared unwilling to host further projects (**Resolution 2013-11, May 28, 2013**). The resolution cited that a significant number of residents (11) had reported negative health effects and that one person had to relocate. At this time, many Ontarians were also upset by the lack of process and consent to hosting renewable energy projects where they lived.

As part of the plan to meet Ontario's growing electricity needs, the government tasked the Independent Electricity Systems Operator (IESO) with managing a series of competitive electricity resource procurements focusing on delivering new electricity generation and capacity (e.g. storage) resources. Municipal governments have an important role in these procurements, determining whether to host projects in their communities and overseeing local development approvals. Without municipal approval of projects where they make sense, the province may be unable to procure enough electricity to meet demand.

The IESO energy procurement process has four stages: Pre-Engagement, Municipal Support Confirmation, Contract review, and Downstream Approvals.

Pre-engagement is the first formal opportunity for municipalities to engage with developers on proposed projects and raise general questions or concerns about a project. Some developers may choose to engage earlier, and in this case, Innergex has reached out to potential leaseholders in the community with a slow response. Where municipalities are not willing hosts for certain types of electricity project(s), e.g., natural gas, wind turbines, battery storage, etc., this pre-engagement offers the first opportunity to indicate to a developer that a project is unlikely to be approved. Communicating this as soon as possible is beneficial to avoid additional resources being directed at a project.

At the September meeting, **RESOLUTION 2024-14-05** was passed, stating that staff be directed to gather input to determine if there is interest from a public perspective in becoming a willing host. The following report outlines the pros and cons of Industrial Wind Turbine projects and provides an executive summary of findings from a survey of residents living close to the existing Industrial Wind Turbine (Conestogo Wind Energy) Centre.

DISCUSSION:

Balancing the pros and cons of renewable energy projects with the community's needs is essential. In rural communities, industrial wind turbine projects can offer revenue opportunities for landowners and, in some cases, for the community while also providing clean energy to meet Ontario's growing electricity demand. Renewable energy projects are also crucial for reducing reliance on natural gas for peak energy generation.

Still, depending on proximity, they can be visually intrusive, noisy, and impactful to human health and wildlife. Research on the impact of wind turbines on property values in Ontario is mixed and appears highly dependent on the size of the project, the proximity of dwellings, and the region in which they are sited. In some cases, property values decreased between 4% and 8%.

In a letter to the Township dated October 3, 2024, MPP Matthew Rae reassured residents of new legislated requirements that:

> *'When it comes to renewable energy projects, it is important to note that, unlike the previous provincial government's approach, municipalities must be willing hosts to any renewable energy projects… and that any proposed renewable energy projects on or near farmland would also require an Agricultural Impact Assessment to be completed.*

Wind Turbine Survey

As per Council's resolution, staff contacted residents who own or rent property within a 2km radius of the Conestogo Wind Energy Project for feedback on their lived experiences. 39 properties were identified, and surveys were mailed out with stamp-addressed envelopes enclosed. A QR code was also provided to complete the survey online. Over 50% of residents responded. Surveys were voluntary and anonymous.

Here is an executive summary of the findings.

- **Location**—80% of residents have lived in the area for over 6 years, with more than half living less than a kilometre from a turbine. Two people had turbines on their property.
- **Visual Impact**—75 % reported moderate to significant impact on their surroundings, and 20% reported no effect.
- **Noise**—55% said they heard the turbines often, 25% said sometimes, and one person said never, with most respondents reporting minor to moderate noise impact on daily life.
- **Health**—A third of residents surveyed reported health issues related to the wind turbines.
- **Other Impacts** – Half of the survey group experienced shadow flicker (when blades pass in front of the sun, causing moving shadows), 20% had witnessed avian or bat injury or mortality, and 1 person reported impacts from infrasound.
- **Perceptions of the Planning Process**—65% stated the process wasn't fair, 25% said it was moderately fair, and one person said it was very fair.
- **Property Value** – 70% of those surveyed said their property value has decreased.
- **Financial Returns** – 90% of those surveyed do not receive any financial return from the energy project.

- **Climate Change** – 80% of those surveyed were concerned about climate change.
- **Is Wind Power Effective in Climate Mitigation?** Most people answered no, five said somewhat, and two said yes.
- **Should Wind Power be encouraged in Ontario?** 75% responded no to this question, and 20% said yes.
- **Overall Experience** – 70% were negative, and 15% were positive.

Summary of Additional Comments.

The survey responses highlighted various concerns regarding industrial wind turbines, particularly their effectiveness in mitigating climate change and their potential impacts on communities, agriculture, and the environment. Many respondents emphasized the importance of fair consultation and expressed how these projects have affected friendships, family relationships, and land values. There is a strong belief that placing wind turbines near communities and prime agricultural areas, like Mapleton, could pose challenges to daily life and livelihoods. Additionally, there were comments about the long-term management of turbines once they are decommissioned, with an interest in exploring alternatives such as solar panels. The primary message calls for considering all residents' perspectives and the importance of achieving community consensus before moving forward with such initiatives.

STRATEGIC PLAN PILLARS:

Vigilant Asset Management: n/a
Prosperous & Diversified Economy: n/a
Our Wellbeing: n/a
Diligent Fiscal Management: n/a
Operational Excellence: n/a

Association of Municipalities of Ontario

Municipal Energy Procurement Toolkit

Guidance for Municipal Decision-Makers and Staff on Long-Term Energy Procurement Projects

Updated: February 3, 2025

Table of Contents

About this Guide

Original Release: February 3, 2025 | Most Recent Update: N/A
AMO Policy Contact: policy@amo.on.ca
AMO Policy Energy Lead: Spencer Sandor, Senior Advisor – ssandor@amo.on.ca

Introduction

Ontario's Independent Electricity System Operator (IESO) estimates that Ontario will need 75 per cent more electricity by 2050 – the equivalent of adding four and a half cities the size of Toronto to the grid. The Government of Ontario's "Powering Ontario's Growth" lays out a path to increasing Ontario's energy supply to support housing growth, economic development, and decarbonization.

As part of the plan to meet growing electricity demand, the government has tasked the IESO with managing a series of competitive electricity resource procurements focusing on delivering new electricity generation and capacity (e.g. storage) resources. Municipal governments have an important role in these procurements, determining whether to host projects in their communities, and overseeing local development approvals. Without municipal approval of projects where they make sense, the province may be unable to procure enough electricity to meet demand.

This toolkit is intended to support municipal officials' review and decisions on proposed energy projects to help support informed decisions. The Association of Municipalities of Ontario (AMO) created it with input from municipal staff, senior leaders and elected officials that have previously considered proposed energy projects. It consolidates answers to common questions and highlights resources that municipalities found useful when engaging with energy developers and assessing proposed projects. Energy project developers may also gain useful insights into what type of information municipalities are likely to be looking for when considering applications for municipal support.

This toolkit includes:

- An overview of the municipal role in the procurement process
- Key considerations municipalities have considered when evaluating energy projects
- Third-party resources municipalities may use to support local review of energy projects

Additional Resources

IESO Resources

The electricity resource procurement processes referred to throughout this document are led by the IESO in accordance with direction issued by the Ontario government. Requirements of procurements may change. This toolkit is based on the "Long-Term 2" procurements (LT2) which are live. LT2 will have annual intakes between 2025 and 2029. The IESO may choose to prioritize different types of projects during each intake, and regularly engages with stakeholders to consult on, and communicate their approach to procurements. Additional future procurement processes may be announced in the future.

Municipalities and energy developers should ensure they refer to the most up-to-date information and guidance from the IESO to inform local decision making. The IESO also has an "Electricity Toolkit for Municipalities" and a resource called "How Electricity Projects are Developed in your Municipality" that can provide insight about the procurement process and requirements.

Third-Party Resources

This toolkit includes links to third-party resources that may be helpful for municipalities considering energy projects. These documents are from a wide range of sources and may include examples from jurisdictions with different regulatory frameworks. These are provided as examples of how municipalities may wish to explore energy projects and are not intended to replace expert or legal advice.

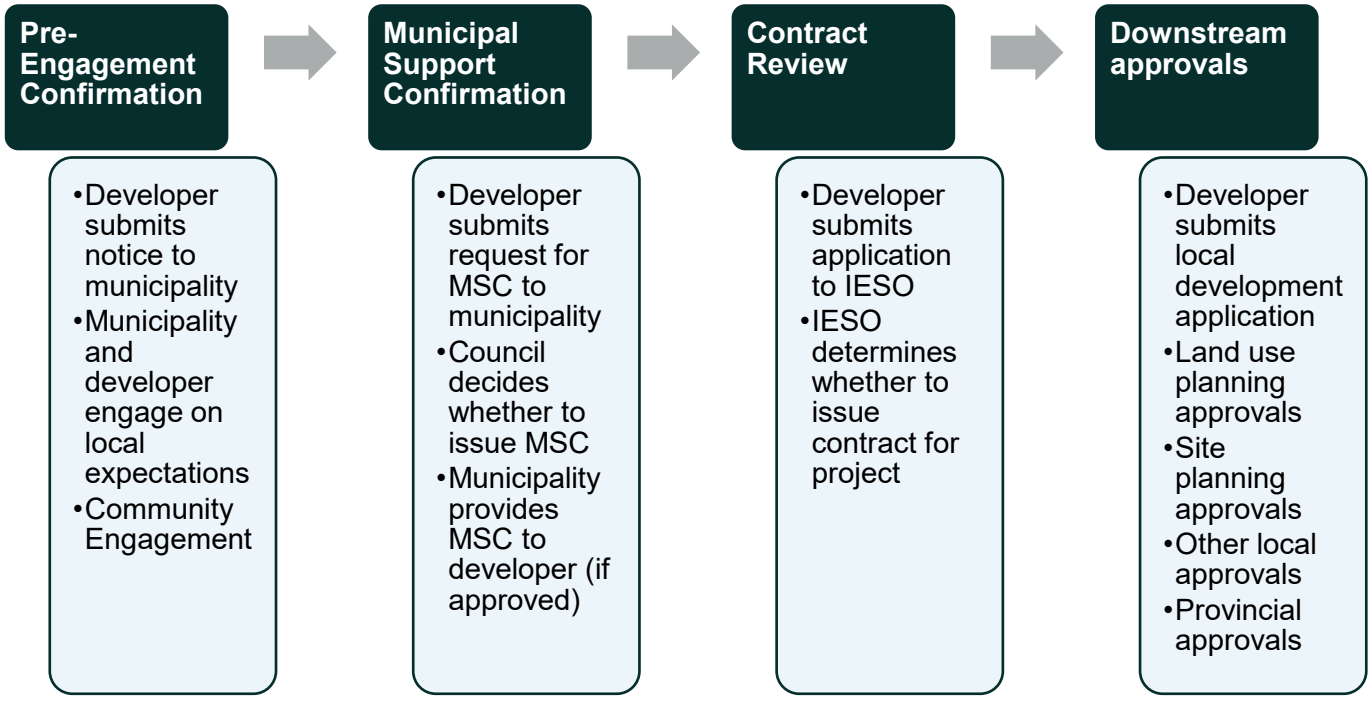
The Municipal Role in Energy Procurements

The Procurement Process

On the direction of the Minister of Energy and Electrification, all electricity project developers are required to obtain written confirmation of municipal support for energy projects within municipal boundaries under the Long-Term 2 (LT2) procurement. This requirement is intended to ensure that municipalities have control over what electricity projects they wish to host within their communities.

To deliver on this direction, the IESO requires project developers to engage early with municipalities to better understand local preferences and needs. Engagement will occur at different stages of the process, including pre-engagement consultation, municipal support confirmations, and downstream approvals. Municipalities have an opportunity for ongoing engagement and communication of local expectations to developers throughout the development process. Like other types of development, the full process from application to construction may be a multi-year process depending on the complexity of each project.

Successful completion of one stage of engagement does not guarantee that municipalities will provide local support or approvals in later stages, nor are municipalities required to give support if they are not satisfied with the information provided by an energy project developer. It is the responsibility of developers to work closely with municipalities to ensure development activities and all associated reporting requirements are completed in a way that is satisfactory to municipal expectations. It is up to municipalities to determine whether a project is in the best interest of the community, and whether they have enough information to make that determination. If a municipality does not support a project at the time of proposal submission, it will not be eligible for an LT2 contract.



Pre-Engagement Confirmation

All energy project developers are required to provide a "pre-engagement confirmation" notice to municipalities early in the development process which informs municipalities of the intent to submit a proposal. This notice includes a request to confirm what land use requirements may be applicable on the proposed project site.

This pre-engagement is the first formal opportunity for municipalities to engage with developers on proposed projects – although developers may choose to engage earlier. As with other development projects, early engagement between municipalities and developers can help identify local expectations and processes. Municipalities should be prepared to provide information about:

- What local approvals may be needed as part of a development project (examples include those in the "Key Considerations when Evaluating Energy Projects" section of this Toolkit)
- Any expectations for public engagement (e.g. public meetings or notices), and
- What timelines developers should expect for decision-making including zoning decisions, and permit applications.

Pre-engagement is also the first opportunity for municipalities to raise any general questions or concerns about a project to the developer. Although developers may not have exact project details at this early stage of the process, they should be able to answer questions around best practices, safety characteristics, and likely impacts of a project. Communicating these questions early can help ensure that answers are made available as the project proposal progresses, and that developers are prepared to answer questions during public meetings.

Conversely, where municipalities are not willing hosts for certain types of electricity project(s), this pre-engagement offers the first opportunity to indicate to a developer that a project is unlikely to be approved. If a municipality is opposed to a particular project, or type of project (e.g. natural gas, wind turbines, battery storage, etc.), it may be beneficial to communicate this as soon as possible to avoid additional resources being directed to a project that is unlikely to be approved. Some municipalities have started proactively adopting local energy plans, or resolutions indicating which types of energy projects may be considered or excluded (e.g. types of generation or storage), and any expectations for projects being brought forward for consideration (e.g. engagement requirements, local approvals such as submission of emergency management plan, negotiation of community benefit agreements.

Municipalities should be prepared to receive requests and engage with developers at this stage. AMO has prepared a document called "Navigating Municipal Relations: A Guide for Energy Developers Proposing Projects under Ontario's Long Term Electricity Procurements" that municipalities may want to share with prospective developers.

Municipal Support Confirmations

As a project progresses past pre-engagement consultation, electricity project developers are required to obtain a "Municipal Resolution in Support of Proposal Submission" ("MRSPS") [1] or

[1] Under previous procurements, these were called "Municipal Support Resolutions" or "MSRs".

blanket support resolution before a project proposal will be considered by the IESO. The MRSPS takes the form of a local resolution confirming several items, including but not limited to:

- that the developer has engaged with the municipality
- that the developer has completed (or committed to completing) public engagement activities to the satisfaction of the municipality
- for projects in prime agricultural areas, that the developer has provided evidence of having considered alternative locations by completing the Pre-Agricultural Impact Assessment (AIA) Submission Filing Requirement
- that the municipality is willing to host the project should it receive a contract and obtain all necessary permits and approvals, and
- any additional items or conditions that the municipal may choose to include.

MRSPSs are a key mechanism to meet provincial direction that energy projects only move forward with the consent of the host community. They are the formal decision-making process through which municipal councils assess information provided by developers about projects and determine whether a project is a fit for their community. Municipalities retain the right to decline a request to issue an MRSPS if they do not support a project moving forward.

MRSPSs provide municipalities with an opportunity to:

- Express a willingness to host a specific energy project subject to any local land-use, site planning, or other approvals
- Identify any local conditions that must be met moving forward for the MRSPS to remain in place (for example completing a safety plan, or entering into a community benefit agreement)
- Ensure there is adequate public engagement, and that any feedback from the community has been received and addressed before a project moves forward.

The IESO has provided a prescribed form that must be submitted as evidence of municipal support, and which includes an example municipal resolution which can be used as a template for MRSPSs . However, municipalities do not have to use this template and can provide an MRSPS in any form so long as the MRSPS includes the required information identified by the IESO (a list of mandatory elements for an MRSPS is included as Appendix A of this document). Municipalities can also choose to include additional content (e.g. conditions requiring additional approvals).

Importantly, MRSPSs are only a moment-in-time expression of support – they are not binding final approvals, and do not guarantee that a project will be awarded a contract. Additionally, because the MRSPS is only intended to indicate support in principle prior to IESO issuing a contract, once a contract has been awarded to a project, there is no effect to revoking an MRSPS. Even after a MRSPS is passed and an IESO contract is issued for a project, municipalities retain the right to:

- Require developers to submit applications or technical studies to obtain development approvals (e.g. zoning, site plan) and other local approvals required by the municipality, and
- Withold or withdraw any locally required approvals if local expectations or conditions are not met.

Given the complex nature of many energy projects, municipalities may wish to consider retaining an energy consultant, or legal expert to negotiate with energy companies, and advise on elements of a proposed project, and what to consider prior to deciding whether to approve an MRSPS. Municipalities should consider retaining someone with expertise or experience dealing with electricity sector proposals,

Once an MRSPS is issued, the project moves forward to the IESO to determine whether to issue a contract for the project. Following the issuance of a contract, most projects are subject to provincial review which may include a Renewable Energy Assessment (REA) which includes assessment of projects' impacts on the environment, and public engagement. The REA process generally takes place concurrently with other local approvals.

Public Engagement Sessions

A notable change between LT2 and previous procurements is that developers are no longer required to demonstrate that discrete public engagement sessions were arranged when submitting a proposal to the IESO. Instead, they are expected to work in collaboration with municipalities to deliver public engagement to the satisfaction of the host municipalities. Municipalities must confirm that this engagement has taken place as part of the MRSPS. Municipalities should be prepared to communicate expectations on public engagement to energy project developers, and may wish to consider working with developers to deliver engagement activities.

LT2 projects may impact asserted or established Aboriginal or treaty rights, and project developers may be delegated by the provincial Crown to carry out procedural aspects of consultation with First Nation and Métis communities. Municipalities may wish to conduct their own engagement with First Nation and Métis communities, and consider the proponent's consultation and engagement efforts with Indigenous communities, to help inform their MRSPS decision, and to support relationships with First Nation and Métis communities.

Optional: Blanket Resolutions

Municipalities may also choose to issue a "blanket" municipal support for energy projects. Where these resolutions have been used in the past, direction is typically delegated to the CAO or other staff member, establishing the authority to provide support confirmations for projects that meet pre-determined criteria outlined in the Council resolution. Under this delegated authority, municipal staff can determine whether a proposed project meets the criteria set out under the blanket resolution and issue an MRSPS without each project having to go to Council for a separate decision.

Criteria included in blanket resolutions often outline which types of projects will or will not be considered (e.g. wind, gas, solar, battery storage, etc.), and identify local approvals or agreements that are pre-conditions of support such as entering into a community benefit agreement, or providing documentation to the municipality (e.g. site plans, emergency management plans, and/or decommissioning plans).

When issuing blanket resolutions, municipalities may wish to consider setting an effective lifespan for the resolution. For example, municipalities could indicate that the blanket resolution is only applicable to the LT2 procurement, a specific intake under the procurement, or for any procurements moving forward until the resolution is revoked.

Blanket resolutions can streamline decision making on projects and proactively signal to developers whether a municipality is open to different types of energy project. Where blanket support is provided, projects are still expected to complete downstream approvals, and municipalities continue to reserve the ability to determine whether to issue permits or other local approvals.

Downstream Approvals

The IESO requires evidence of an MRSPS prior to issuing a contract for an energy project. The MRSPS does not however replace any other local or provincial approvals. This includes local development applications, permits and processes (e.g. those under the Planning Act, or Municipal Act), as well as any necessary provincial approvals (e.g. renewable energy approvals, approvals under the Public Lands Act for Crown land projects). After an MRSPS is issued, municipalities continue to reserve the to determine whether to issue permits or other local approvals.

Successfully obtaining these approvals is a condition of the contract between the IESO and project developers and as such, does not need to be set as a local condition for an MRSPS. However, some municipalities may prefer to consider whether downstream approvals such as rezoning, or site plan approvals are likely to be successful prior to issuing an MRSPS.

The decision of a municipality to provide an MRSPS to a specific project is not intended to replace, or guarantee that additional approvals will be provided.

Key Considerations When Evaluating Energy Projects

There are a range of policy and technical considerations that municipalities may wish to contemplate when determining whether to provide an MRSPS, or other local approvals. The details and interests may differ between communities. This section outlines some of the key issues considered by municipalities to date when reviewing projects. Depending on local preference, these considerations may be taken into account at different (or multiple) stages of a project as outlined in the previous section. Like with other development projects, municipalities should be prepared to communicate their preferences and expectations to energy project developers.

Land-Use and Site Planning

Decisions regarding official plan designations, zoning, and site-planning are not required to be made prior to issuing an MRSPS. However, municipalities often take high-level land-use questions into account while considering whether to provide support for a project. Even if these considerations are not addressed prior to an MRSPS, municipalities and project developers should also be prepared to work together to address these key issues during downstream approvals.

Project Siting

Municipalities have considered some of the following key issues while reviewing projects:

- What requirements exist under the Provincial Planning Statement, local official plan, zoning by-laws or other local policies? Does the project meet these requirements?
- How would projects impact, or be impacted by surrounding land-uses?
    - What areas of the municipalities, or surrounding uses are preferred locally? For example, some municipalities have found that projects located in industrial areas or former aggregate pits receive more community support than projects located in agricultural areas or near residential areas.
    - How would the project interact with future growth planned in the area?
    - Is the project located in proximity to electricity transmission lines that are required to connect the project to the energy grid?
- What mitigation should be in place regarding noise, vibration, environmental impacts? What setbacks or minimum distances from other land uses should be required? (Note: setbacks can often be addressed through downstream approvals such as through noise studies, or fire safety plans.)
- What servicing may be required for the project site (e.g. water service, road access)?

Agricultural Protection

Under LT2, ground-mounted solar projects are prohibited in prime agricultural areas. All other LT2 projects proposed in prime agricultural areas are required to submit the IESO's Pre-AIA Submission Filing Requirement to the satisfaction of the municipality. This document outlines how a project developer considered alternative locations and arrived at their chosen project site. In addition, if a contract is awarded to a project located in a prime agricultural area, an Agricultural Impact Assessment (AIA) must be completed by the proponent, and to the

satisfaction of the host municipality within 18-months of the IESO contract having ben offered. The Ministry of Agriculture, Food and Agribusiness has issued draft guidance on how to complete and review an AIA and is preparing additional guidance to support the LT2 procurement.

The IESO has provided guidance on AIAs and how they should be addressed under the procurement process. In particular, municipalities should be aware that there is not a requirement for an AIA to be submitted, reviewed, and approved by a municipality until 18 months after a contract is issued. This means that a full AIA may not be available prior to a municipality making an MRSPS decision. However, as part of the MRSPS process, developers must provide alternative locations for the project prior to the MRSPS in case the original proposed site cannot be approved under the AIA. The template MRSPS from the IESO includes a requirement for municipalities to verify that these alternative locations have been identified.

Resources Available to Support Land Use Planning and Siting Considerations

- Ontario Ministry of the Environment, Conservation and Parks
  - Renewable Energy Approvals
  - Technical Guide to Renewable Energy Approvals
- Ontario Ministry of Natural Resources
  - Renewable Energy Project Approval and Permit Requirements
- Independent Electricity Systems Operator
  - Agricultural Impact Assessment Questions and Answers
- Ministry of Energy and Electrification
  - Ministerial Directives Issued to the IESO for LT2

The following additional resources from other jurisdictions may provide valuable technical assistance. However, it is important to note that these resources may not align with Ontario's specific legal and regulatory requirements and should be treated as guidance only:

- Quest Canada
  - Integrating Energy Planning and Land-Use Planning: Taking Stock and Looking Forward
- Pacific Northwest National Laboratory (On Behalf of the US Department of Energy)
  - Energy Storage in Local Zoning Ordinances
- American Planning Association
  - Zoning Practice: Battery Energy Storage Systems

Emergency Management and Environmental Protection

Municipalities have reported that residents are concerned about ensuring that proposed projects are safe and may expect municipal review of safety and mitigation plans. Further, as the primary provider of certain emergency services, municipalities should be actively engaged in discussions with energy developers to ensure that adequate emergency response plans are in place, and appropriate.

The approval of fire safety and emergency management plans is frequently completed as part of downstream approvals rather than prior to issuing an MRSPS. However, some municipalities have included the successful completion of these plans as a condition for issuing an MRSPS.

Municipalities do not have sole responsibility for assessing safety or environmental impacts. The provincial government also has several reviews and approvals that must be completed before a project can move forward.

- A Renewable Energy Approval (REA) from the Ministry of the Environment, Conservation and Parks (MECP) is required for most solar, wind, or bio-energy projects in Ontario.[2]
- Battery energy storage system (also called “BESS”) facilities require registration to the Environmental Activity & Sector Registry. Natural gas fired facilities require an Environmental Compliance Approval.
- New water powered facilities are subject to the Environmental Assessment Act, and Ministry of Natural Resources (MNR) approval under the Lakes and Rivers Improvement Act.
- For all project types, an Endangered Species Act permit may be required from MECP if species at risk or their habitats are impacted.

These environmental permissions processes include a review of environmental impacts to ensure that projects are unlikely to have adverse impacts on communities. All energy projects are generally subject to safety and building code requirements, similar to any other development.

Fire Safety and Emergency Management

Fire safety, particularly around proposed BESS projects, has been routinely identified by municipalities and residents as being of high interest. The Office of the Ontario Fire Marshall (OFM) has indicated that all Fire Chiefs in Ontario have access to an advisor at OFM who can provide support when reviewing energy projects.

Municipalities have considered some of the following key issues while reviewing projects:

- Does the project have an emergency management plan that outlines key risks, mitigation, and responses? Does the emergency management plan align with best practices from the Ontario Fire Marshall or other experts?
- Will the project have on-site staff monitoring the facility during the life of the project? How would these staff be able to work with the municipality to ensure safety and minimize potential impacts of an emergency incident.
- How would local first responders need to respond in the event of an incident?
    - Does the municipality have the capacity, equipment, and/or training to respond?
    - Will the proponent cover the costs of any training or equipment needed to improve local capabilities?
- Does the proposed site have the right infrastructure to facilitate access by first responders?
- Would the impact of an incident be localized to the project site, or widespread? What mitigation needs to be in place to minimize impacts?

[2] An REA is not required for rooftop solar, some classes of small-scale wind and ground-mounted solar, and certain bio-energy and thermal treatment projects.

Environmental Protection

Ontario is home to many different types of energy projects that use various technologies to generate or store energy. The potential environmental impacts differ from project to project, and a wide range of environmental considerations apply to these projects including impacts to carbon emissions, natural habitats, or source water. Concerns about environmental impacts apply to both renewable projects and carbon emitting projects (e.g. leaks from natural gas pipelines, or battery cells at BESS sites).

Many environmental mitigation measures can be addressed through downstream land use processes and subsequent approvals (e.g. ESA permits, Fisheries Act approvals). Electricity generation projects are also subject to provincial assessment of environmental impacts through the Renewable Energy Approvals (REA) or Environmental Assessment (EA) process).

Municipalities have considered some of the following key issues while reviewing projects:

- What provincial assessments might apply to the project?
- Is the project subject to review by the local Conservation Authority?
- Does the project have a Stormwater Management Plan that meets local needs?
- What mitigation measures can be put in place to reduce risks to locally important sites, such as municipally-managed natural spaces, public parks, or culturally significant areas/buildings? Can these be addressed through existing processes such as the site plan process?

Resources for Fire Safety and Environmental Protection

- Ontario Fire Chief's Association Guide
  - Solar Electricity and Battery Storage Systems Safety Handbook for Firefighters.
- Ontario Ministry of the Environment, Conservation and Parks
  - Technical Guide to Renewable Energy Approvals
- Ontario Ministry of Natural Resources
  - Renewable Energy Project Approval and Permit Requirements
- Hydro One Guide
  - BESS Fire Protection Risk & Response Assessment Standard

The following additional resources from other jurisdictions can provide valuable technical assistance, though it's important to note that these resources may not align with Ontario's specific legal and regulatory requirements and should be treated as guidance only:

- Energy Storage Canada
  - Battery Energy Storage: Thermal Runaway and Fire Risk
- Canadian Association of Fire Chiefs
  - Lithium-Ion Battery Resources for Fire Services including Battery Storage Systems
- Case study: Weymouth Town, U.S.
  - Risk Assessment Study for BESS at Fore River Energy Center

Project Decommissioning

Under the current IESO procurement process, contracts are issued for a fixed duration. Contracts between the IESO and energy companies do not include requirements for decommissioning at the end of project life. At the end of a contract, energy companies may decide to end operations and decommission the project or apply for a contract extension or renewal. Contract extensions will likely require equipment upgrades or replacement.

Projects that are subject to the provincial REA process are required to include a Decommissioning Plan Report which describes how a project site will be restored as close as possible to its original condition (or to the land use designation of the area at the time of decommissioning). The costs associated with decommissioning are often covered in the land lease agreement with the participating landowners, and are generally expected to be borne by the owner/operator of the energy facility.

Municipalities may wish to consider:

- Is decommissioning for a specific project type addressed through provincial requirements (e.g. renewable energy approvals)? If not:
    - Who will be responsible for the cost, and process of decommissioning end of life assets? Is this addressed through an enforceable legal framework (e.g. the land lease agreement with the landowner, a municipal development agreement, or site plan tools)?
    - Through what local mechanisms could decommissioning requirements be set and upheld in the future (e.g. site plan control, community benefit agreement, municipal by-laws)?
- Does the energy company have a standard process in place for decommissioning and/or land reclamation?
- If an energy company does not remain solvent, or a project is abandoned, where does the responsibility for decommissioning fall?
- Does the municipality wish to include any priorities for decommissioning in an agreement with the developer (e.g. restoring lands to agricultural use, re-naturalizing land)?

Resources for Decommissioning

- Ontario Ministry of the Environment, Conservation and Parks
    - Technical Guide to Renewable Energy Approvals

The following additional resource from the United States may provide valuable technical assistance, though it's important to note that this resource may not align with Ontario's specific legal and regulatory requirements and should be viewed as providing guidance only:

- U.S. Energy Storage Association (ESA)
    - End-of-Life Management of Lithium-ion Energy Storage Systems

Community Benefits, Costs and Community Benefit Agreements

Cost and Benefits of Hosting Energy Projects

As with other economic development projects, municipalities may incur costs to service and host electricity generation and storage projects. This may include new infrastructure such as improvements to roads for emergency access, or water infrastructure for fire response. It may also include improvements to local services such as new equipment and training for firefighters. Municipalities may also incur costs to retain expert advice to support project review, downstream approvals, or negotiations.

Similarly, like other types of development, electricity projects may bring financial, or other benefits to the communities. This may include property tax assessment increases, employment opportunities, or progress towards local energy or climate plans. Some developers may also offer community funds or sponsorships to local organizations.

Some municipalities report that the potential benefits to the community may not offset the potential costs. For example, increased property tax assessment may not be sufficient to cover increased infrastructure or servicing costs. Benefits may also only be temporary – for example, while a project may result in short-term construction jobs, these may not be filled by local residents, and long-term jobs may not be created. It is important to engage with developers to build a shared understanding of what benefits a community may experience.

Community Benefit Agreements

Municipalities are increasingly looking to community benefit agreements (CBAs) as opportunities to recover costs, secure meaningful local benefits, and share in project revenues so they can be reinvested into the community in the long-term. CBAs are formal agreements through which municipalities and project developers negotiate terms to ensure that both parties are sharing in the potential benefits of a project, and that all costs can be recovered.

Although CBAs are not currently required as part of the procurement process, municipalities may ask for them as a condition of support in providing an MRSPS. As with other types of development, municipalities should work with developers to negotiate an agreement that is beneficial to the community. A best practice for municipalities choosing to negotiate a CBA is to retain expert legal counsel to represent the municipal interest in negotiations. A legal advisor with experience working with energy projects and commercial negotiations can provide guidance about what terms to include as part of an agreement and support negotiations with project developers.

When considering potential costs and benefits, or whether to pursue a CBA, municipalities may wish to consider:

- What costs may the municipality incur to support the project? (e.g. infrastructure, local services and equipment, professional services, consultants for downstream approvals)
- What benefits may the project bring? (e.g. energy reliability, assessment growth, development opportunities)

- Is the developer proactively offering a community benefit agreement, or another form of support to the municipality? (e.g. access to a community fund)
- What expertise does the municipality need to procure to negotiate a community benefit agreement with the project developer?

Some common CBA contents include:

- A payment to the municipality based on the amount of energy generated or stored that would become general revenues for the municipality to direct towards local services
- A financial contribution from project developers to the municipality to support project related costs such as:
    - New or upgraded infrastructure related to supporting the project
    - Municipal services required to support the project
    - Professional fees incurred by the municipality to support CBA negotiations (e.g. legal fees), technical consultant project review, and downstream approvals
- A requirement for energy proponents to bear the cost of decommissioning projects when they reach end-of-life

Resources for Community Benefit Agreements

There is no standardized template for CBAs related to electricity projects in Ontario. As a result, unique agreements are typically negotiated on a project-by-project basis. The following resources provide insight into CBAs content.

- Clean Air Task Force - List of Resources on Community Benefits
    - Community Benefits Resource Inventory
- Columbia Law School's 35 Recommendations for Developers and Host Communities
    - Expert Insights on Best Practices for Community Benefits Agreements
- Clean Coalition Organization CBA Research
    - Finding the Balance: Benchmarking Solar, Wind and Energy Storage Community Benefits Agreements
- World Resources Institute Insights
    - US Clean Energy Projects Need Public Buy-in. Community Benefits Agreements Can Help
- Government of Scotland
    - Community benefits from onshore renewable energy development – Guidance on good practice principles for communities, businesses, local authorities, and others
- Local Energy Scotland- Community and Renewable Energy Scheme (CARES) CBA Support
    - Resources: Community Benefits Toolkit, document template for Community, Benefits agreement, community benefit Memorandum of Understanding guidance and template, related case studies
- University of Michigan
    - Renewable Energy: Providing a Spectrum of Potential Community Benefits
    - Beyond Renewable: Incorporating social sustainability & community benefits into renewable energy projects

Appendix: Mandatory Elements of a Municipal Resolution in Support of Proposal Submission (MRSPS)

Should a municipality wish to develop its own resolution, to meet the minimum requirements of the IESO's RFPs, the resolution must:

(A) identify:

(i) the Unique Project ID of the Project

(ii) the name of the Project

(iii) the name of the Proponent

(iv) the generation technology type of the Project

(v) the maximum potential Contract Capacity of the Project; and

(vi) the Property Identification Number (PIN), municipal address, legal description or GPS coordinates of the Municipal Project Lands; and

(B) confirm:

that the Proponent has delivered a Pre-Engagement Confirmation Notice to an applicable Local Body Administrator in respect of the Local Municipality that includes the information above, except for the Unique Project ID which should only be required as part of the Pre-Engagement Confirmation Notice if available; and

(C) state:

(i) that the Local Municipality supports the submission of a Proposal for the Project located on the applicable Municipal Project Lands. The statement in such resolution may be qualified as being solely for the purposes of satisfying the mandatory requirements under Section 4.2(b) of the LT2 RFP, and does not supersede any applicable permits or approvals under applicable Laws and Regulations that may be required for a particular Project;

(ii) that that the Proponent has undertaken, or has committed to undertake, Indigenous and community engagement activities in respect of the Project to the satisfaction of the Municipality;

(iii) whether or not the Municipal Project Lands are designated as Prime Agricultural Areas as set out in the Local Municipality's Official Plan as of the date of the resolution; and

(iv) if the Municipal Project Lands are designated as Prime Agricultural Areas:

(a) the Municipal Project Lands are not designated as Specialty Crop Areas;

(b) the Project is not a Non-Rooftop Solar Project;

(c) the Proponent has satisfied the Pre-AIA Submission Filing Requirement to the satisfaction of the Municipality; and

(d) if the Proponent is selected as a Selected Proponent under the LT2 RFP, the Municipality will engage in good faith with the Selected Proponent to enable the Selected Proponent to complete an Agricultural Impact Assessment.

Association of Municipalities of Ontario

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Feedback Form

Long-Term 2 RFP – April 24, 2025

Feedback Provided by:

Name: Warren Howard

Title: Consultant

Organization: Retired

Email: howardwarr@aol.com

Date: April 28, 2025

To promote transparency, feedback submitted will be posted on the LT RFP engagement page unless otherwise requested by the sender.

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

Following the LT2 RFP April 24, 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 LT2 engagement web page.

Note: The IESO will accept additional materials where it may be required to support your rationale provided below. When sending additional materials please indicate if they are confidential.

Please submit feedback to engagement@ieso.ca **by May 9, 2025.**

Tariff Risk Mitigation

Do you have any comments related to the tariff risk mitigation concepts presented during the webinar?

LT2 RFP and Contract Updates

Do you have any comments related to the other RFP and Contract updates presented during the webinar?

Status of the AIA

The division of the Agricultural Impact Assessment into 3 phases does not align with the discussions currently taking place in the municipal consultation process. The key concern in rural southern Ontario is protection of Prime Agricultural Lands and the constraint imposed by the 2024 PPS is that non-agricultural uses be limited in scope. As discussions about energy projects are currently underway with municipalities, the guidance from the AIA is needed now.

In the absence of AIA guidance on the estimates of the land required by project components provided by proponents are a concern. While they fall within the limits suggested in the current documents, they do not align with previous experience with the land requirements of similar projects. This leaves the municipal Councils and community groups operating in the policy vacuum created by the IESO.

The full AIA direction is required before municipal councils are asked to support Municipal Support Resolutions. It also exposes the municipal support resolutions based on faulty claims from proponents subject to appeal to the Ontario Land Tribunal as the project is not aligned with the requirements of the Provincial Policy Statement.

This direction cannot wait until 18 months after the contracts are issued, the full AIA needs to be available before municipalities are asked to approve support resolutions. If the document cannot be finalized to meet the current timelines, the proposal submission guidelines need to be adjusted to align with the AIA timelines.

Alternate Sites

If a project is to be located in a Prime Agricultural Area, the process requires proponents to provide municipalities with an assessment of alternate sites that they have considered. The assumption is that if no more appropriate sites are identified, then it is appropriate to proceed with the recommended location.

Energy projects can be located in a wide range of locations and the IESO points system confirms an IESO preference for sites outside of Prime Agricultural areas and in northern Ontario. On this basis, it is not appropriate to limit that analysis of alternate sites to a single municipality, particularly if municipality is largely classed as a Prime Agricultural Area.

The attached map of zoning in South-West Oxford illustrates the situation. Two wind turbine projects are proposed for this township. Clearly there is no way that either of them can avoid use of Prime Agricultural Land which is shown in light yellow in the map.

Rural Zoning in South-West Oxford

To be consistent with the IESO's and the government's direction, municipalities need to have the option of not supporting a project even if the proponent claims to be unable to find an alternate location that meets the IESO's preferences and the requirements of the PPS.

LT2 RFP Requirements for Crown Land Projects

Do you have any comments regarding the new Proposal Submission requirements for Crown Land Projects?

LT2 RFP Deliverability Update

Do you have any comments regarding the deliverability guidance updates presented during the webinar?

General Comments/Feedback

Five Reasons Renewable Energy Developers are Losing Confidence in Ontario

In 2024, renewable energy developers had all the right reasons to be optimistic about the prospect of building solar and wind installations in Ontario:

> Energy and Electrification Minister Stephen Lecce touted the upcoming power purchase as being "technology agnostic" with a focus on the "lowest cost resources".
>
> The last procurement under the former Minister of Energy revealed that gas is expensive: battery storage beat out gas on price by a wide margin.
>
> Worldwide, renewable energy costs keep dropping – utility scale solar and wind significantly outcompetes both gas and nuclear energy on a cost basis.
>
> Ontario's politicians are boasting about the upcoming energy procurement as unprecedented in volume: a total procurement of 7,500MW in the next four years which is enough to power over 1.6 million homes.

So why are renewable energy developers hesitant about participating in the upcoming opportunity to submit proposals for new electricity generation for the Long-Term 2 (LT2) procurement?

Let's examine the evidence:

trying to undermine the Greenbelt – it has slammed the door shut on ground-mounted solar in all agricultural lands including Ontario's marginal farmland. While the previous solar program (the Feed-in-Tariff) excluded ground-mount solar from the best agricultural areas, the current power purchase is excluding solar projects on all farmland. Ontario's less productive farmland is ideal for "agrivoltaics" projects that combine pasture or grazing land with ground-mount solar projects.

2. **Giving Ontario's lowest tier municipalities inordinate responsibilities in approving renewable energy projects**. While the previous Ontario government overrode municipalities with renewable project approvals (never a good idea), the current government is giving Ontario's municipalities an inordinate amount of power to say "no" to renewable energy projects if there is local opposition to renewable energy projects. Energy developers are required to not only get Municipal Support Resolutions (MSRs) from local Councils but project proponents must also complete to the satisfaction of the host municipality an Agricultural Impact Assessments (AIA) if applicable, zoning and site plan approvals. All these activities may be challenging to lower-tier municipalities especially as typically higher tier municipalities throughout rural Ontario deliver planning functions.
3. **Delays by government Ministries are jeopardizing renewable energy business case development and potential investments.** The Ministry of Natural Resources

temporary meteorological masts (towers for wind measurements) on Crown land. This is causing significant delays and risking that wind projects on Crown land will not have the data to bid in the upcoming power purchase.

4. **Proposing a ban on Chinese components from all future energy purchases in Ontario.** During the recent Ontario election, the governing party committed to ban "Chinese components from future procurements to keep our grid secure". If this is actually put into effect, it will disproportionately impact solar developers interested in bidding in Ontario's upcoming power purchase as Chinese content typically exceeds 80 per cent for solar panels.
5. **Stacking the deck in favour of natural gas developers**. Natural gas power plant developers are being offered an unquestionable advantage in the upcoming Request for Proposal (RFP) by giving full points to natural gas developers while not offering the same opportunity to battery storage proponents. And top points to facilities that can run for twelve hours continuously – something that only a gas plant can do. Despite repeated claims to the contrary, the current approach is neither technology agnostic nor does it reflect that Ontario's peak demand is a maximum of six hours in any 24-hour cycle in both winter and summer.

What was presented as a new era in energy purchasing in 2024 by the Ontario government, technology agnostic and

utility bills but the planet and our communities will pay a price with an increasing reliance on a dirtier energy grid.

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Outlook

Oxford County

From Warren Howard <howardwarr@aol.com>
Date Mon 2025-05-05 4:44 PM
To Julie Hamilton <JHamilton@arran-elderslie.ca>; tom Allwood <councillorallwood@greyhighlands.ca>

There are two active projects in South-West Oxford plus the adjoining township of Malahide in Elgin.

The larger one is a 200 MW from 34 turbines by wpd. The second one is an 36 MW project of 6 turbines by ProWind which failed last year to get municipal support from 3 other townships in Oxford for this project.

Things were taking place under the radar but two groups of activists have undertaken to organize 3 community meetings over next weeks including this coming Thursday.

The projects both involve wind turbines close between 5.5 MW and 6 MW.

The community response seems to be similar to the other Oxford communities. The strategy is to go for an Unwilling Host resolution in the two townships.

Warrem