

# WCO | WIND CONCERNS ONTARIO

February 22, 2023

IESO Engagement

*Via email*

Attached is a report that summarizes information gathered from across Ontario about the process used to develop Battery Energy Storage Systems proposals for submission to the IESO's E-LT1 RFP that closed February 16. The situations reported are raising concerns across rural Ontario with the program and they should provide the basis for concern within the IESO.

Key observations:

- **Standards needed for emergencies** – As BESS technology is relatively new, standards are rapidly changing in response to emergency situations encountered. Even projects developed by companies with extensive battery experience have experienced serious emergency situations.
- **Not enough information** – The requirements for submissions to the IESO and to municipalities when requesting support for the project include few, if any, details on the actual project. The process appears to assume that once a company is awarded an IESO contract based largely on price, it will then proceed to develop the real proposal which will be submitted into an undefined permitting process or processes. Based on information submitted, it is not clear how the IESO will be able to distinguish between proposals with higher prices because they meet high standards for development and those with lower prices because the proposal includes the minimal safety standards.
- **Renewable energy or not?** – BESS systems are neither defined as a Renewable Energy project by Regulation 359/09, nor are they included in the list of excluded projects. The intention may be to omit further provincial review of these projects and to proceed directly to the municipal permitting process but this would be a recipe for substantial delay as the building officials in each host municipality (many of which are small rural municipalities) individually develop the expertise needed to assess and approve these projects.
- **Safety regulations?** – While Ontario Hydro has defined setbacks from BESS installations to protect their infrastructure, there are no setbacks for BESS installations established in Regulation 359/09 to protect other buildings and activities. Similarly, there are no noise standards for these systems which could create a new enforcement challenge for Ministry of Environment, Conservation and Parks field staff.
- **Potential for support to be withdrawn** – As the submissions to municipalities have included minimal information, there is potential for municipalities to rescind their support resolution once they learn the risks associated with these projects and the municipal resources that will be potentially required to deal with emergency situations.

The Wind Concerns Ontario paper proposes that more structure be imposed on the approval of these projects. They should be brought within Regulation 359/09 and one central group be established to complete a technical review of the project ensuring that they meet safety standards and established provincial setbacks. Their assessment would be passed to the host municipality who needs to review the support requirements that they will need to provide. That package would then be presented to municipal Council for final approval after which it would proceed into the permitting process.

While this proposed process provides a more structured, multi-leveled approval process, it will likely streamline approvals as the required technical expertise is developed in one location rather than in each municipality while municipalities would be in a position to consider the actual needs that the projects will apply.

Yours truly,

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