

WCO | WIND CONCERNS ONTARIO

September 15, 2023

Engagement@ieso.ca

RE: Feedback on IESO Long Term RFP Process

On May 18, Wind Concerns Ontario provided extensive comments on the proposed RFP process and related documents. In particular, we highlighted concerns with the forms and process for municipal support resolutions. The proposed process expects a municipal Council to endorse a resolution based on minimal information – the name of the proponent, the name, technology and maximum capacity involved and the precise location of the project.

There were no changes to the forms, as posted in the late August update.

In fact, there appear to be even fewer requirements for community consultation. The forms require confirmation that a website has been created and public meetings have been held, but there are no specific requirements related to what information is to be provided on the proponent's website or in the public meetings.

There is no process through which for citizen or community groups may express concerns about the nature of the project proposals.

Hydro One, as a participant in the process, identified in late June what they termed a gap in the IESO process related to the development of consistent standards that address the potential impact of BESS fires on Hydro One's critical transmission infrastructure. They generated a draft set of standards in mid-July that were put out for public comment (see attached). On page 10, they set out the minimum design documentation that is required for their assessment of the connection of BESS systems to Hydro One facility. While this specific work only applies to Hydro One facilities, most of their recommendations would also address more general municipal and community concerns about the impact of BESS facilities.

If proponents of BESS systems are required to provide this information to Hydro One before they can be approved for a Hydro One connection, it would seem appropriate that similar information be required for submissions requesting municipal support resolutions. In comparison, the IESO's continued recommendation that only minimal information be provided to municipalities seems completely inadequate.

In our May 18 comment document, we noted that the information provided by proponents when requesting a municipal support resolution needs substantially expanded. The IESO seems to have ignored this input, but the subsequent work by Hydro One confirms that our May 18 recommendation was appropriate and adjustments for the RFP forms are required. The information provided in the community consultation process should parallel the information required for municipalities.

These requirements represent a substantial change in the process which would invalidate all previous municipal support resolutions provided under the previous requirements. New municipal support resolutions based on full discussion of the requirements will be needed. Where these support resolutions were used by the IESO to award contracts, a provision will be required to allow municipalities to withdraw their previous support for the projects based on new information.

In the past, we have experienced situations where the IESO ignored recommendations regarding the municipal support process and were forced to change the terms of an RFP after it was issued. We trust that these very basic requirements can be implemented in the municipal support and community consultation forms before the next RFP is issued.

We have copied the Association of Municipalities on this letter as they may want to develop a set of requirements on behalf of their membership.

Yours truly,

Jane Wilson,

President, Wind Concerns Ontario

cc.

Association of Municipalities

Hon. Todd Smith, Minister of Energy, MinisterEnergy@ontario.ca

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