

Feedback Form

Long-Term 2 RFP – December 12, 2024

Feedback Provided by:

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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.