

MULTI-MUNICIPAL ENERGY WORKING GROUP

Tom Allwood, Councillor, Grey Highlands, Chair
Todd Dowd, Councillor, North Bruce Peninsula, Vice-Chair
1925 Bruce Road 10, Box 70, Chesley, On N0G 1L0
519-363-3039 Ext.105 Fax: 519-363-2203
jfenton@arran-elderslie.ca

The Multi-Municipal Energy Working Group (MMEWG) has reviewed the process used in 2025 to develop project proposals for IESO's LT2 Request for Proposals (Energy) and makes the following observations:

Conflicting Direction

Municipalities have been provided with conflicting direction by various provincial agencies:

- In the October 2024 Provincial Policy Statement (PPS), the Ministry of Municipal Affairs and Housing confirmed that protection of agricultural land is a priority for the government by expanding the definition of agricultural land to include both Class 1 – 3 soils but also class 4-7 soils. The PPS states that energy projects located on agricultural land must be limited in size and be a secondary use of the land. These rules apply to all municipalities after October 2024.
- The IESO has created a different set of rules for the development of contract proposals that are more restrictive in terms of solar projects. For wind turbine projects, the direction from the IESO focuses proponents on municipal Official Plans even though these documents may not have been updated to reflect the expanded definitions of agricultural land the new PPS.
- Older documentation from the Ministry of Agriculture, Food and Agribusiness provided a clear definition for the PPS's term "limited size" at 1 HA or 2.5 acres. This important detail is missing from the new guidance in the IESO's Agricultural Impact Assessment.

Proponent Proposals

The proposals developed by proponents suggest that their land agents have focused on available land with minimal, if any, references to Official Plans or soil types. This suggests that proponents may not have fully considered the direction provided in both the PPS and by the IESO.

Local Community Response

The local communities have largely rejected these proposals, not because of resident concerns, but due to concerns about protecting agriculture. This suggests that community and municipal responses generally reflect the direction outlined in the PPS. Proponents were generally unable to provide information on the steps being taken to protect prime lands used for agriculture and how problems caused by projects in other communities would be addressed.

Recommendations for Improvement

- Align the IESO Documentation. All planning documents must reflect the latest PPS direction, especially regarding soil protection. Where Official Plans are outdated, proponents should use current soil maps.
- Streamline Agricultural Impact Assessment: Merge the two phases of the AIA into a single, comprehensive document, ensuring clear answers are provided to municipal councils before any Municipal Support Resolution (MSR) is considered.
- Clarify Project Size Limits: The AIA should explicitly address the PPS requirement for energy projects on agricultural land to be "limited in area" and detail how this is to be calculated.
- Enhance Transparency: Establish minimum requirements for public consultation, including for projects on Crown Land, and clearly identify project sites using civic addresses.
- Improve Municipal Guidance: Municipal officials and staff struggle with the IESO process often relying on guidance from proponents which sometimes can be inaccurate or self-serving. The IESO needs to provide concise, accessible resources to municipalities upon notification of a proposed project, rather than relying on lengthy webinars.
- Monitor Proponent Compliance: Implement processes to ensure proponents follow IESO instructions and maintain transparency with host communities.
- Update Siting Guidance: Develop new guidance for separation between energy projects and recreation areas such as provincial parks, considering economic impacts.

Special Considerations for 2026

Some municipal by-laws restrict Council's ability to make long term commitments, which would include Municipal Support Resolutions. At the same time, there is increasing risk of projects becoming political issues. Some municipalities also have special procedures for reconsideration of proposals that were rejected in 2025.

Conclusion

For future energy procurements, the IESO must ensure its processes are transparent, align with provincial land use priorities, and support municipalities with clear, timely guidance. Protecting agricultural land and ensuring meaningful municipal and community engagement are essential to the credibility and success of Ontario's energy planning.

Yours truly,

Julie Fenton per.

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

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