

## Feedback Form: Draft LRP II RFQ and Prescribed Forms

Feedback on the draft LRP II RFQ and Prescribed Forms must be sent to [engagement@ieso.ca](mailto:engagement@ieso.ca) by **July 14, 2016**.

Please identify the section number, definition or appendix of the draft document that you are providing feedback on.

### Submitter Information:

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### Section

### Feedback

1.1	<p>ORA supports the inclusion of upgrades and optimizations of existing waterpower generation in LRP II; however, we submit that there should be no additional MW assigned to waterpower - the total amount of new and upgraded waterpower should be no more than 50 MW.</p> <p>We currently have a surplus of power, and millions/billions of dollars are being lost when excess power is sold at a loss.</p> <p>Waterpower using headponds to provide power during peak demand hours carries numerous negative impacts to water quality, water quantity, fisheries, and communities, and should only allow true run-of-river operations under the Green Energy Act.</p> <p>Additionally, climate change is bringing increased unpredictability and uncertainty of water availability. It may be necessary to shut down hydro facilities for extended periods, or perhaps even permanently if it is leading to severe environmental or socio-economic impacts.</p> <p>The IESO is extending the life of an existing plant for 40 years when it issues a power procurement contract. What will our world be like in 10 years' time with escalating droughts, let alone in 40 years.</p> <p>Waterpower is not an appropriate renewable energy source in our warming and unpredictable climate. The water resource management community has not yet developed an alternative vision capable of embracing this new reality.</p> <p>The hydrological cycle—surface and ground water, precipitation, soil moisture, snowpack and glaciers, flow regime and hydroperiod, runoff, and evapotranspiration—responds to even small shifts in climate in often unpredictable ways.</p> <p>According to the United Nations World Water Assessment Programme, for humans, climate change is water change. Long-functioning waterpower facilities face new operational hurdles that will be extremely challenging over the years.</p> <p>Additionally, there must be up-front dam decommissioning provisions to allow for these facilities to be removed without burdening the taxpayer.</p>
2.5.1.5	<p>It is reassuring that you have stipulated technological upgrades and optimizations of "Existing Renewable Generation Facilities". It won't be long before the Ontario Waterpower Association will</p>

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	<p>seek inclusion of conversions of water control dams to hydroelectric facilities. ORA recommends additional consultation before the inclusion of upgrades and optimizations of existing facilities are included in any LRP II RFP</p>
2.8	<p>It should not be necessary for the public or other regulatory agencies to file a FIPPA to acquire the name and status of a proponent or its contract. ORA recently had to file a FIPPA to learn of the termination of 19 FIT Contracts. Consequently, we discovered that all 19 contracts had been terminated a year ago. This left stakeholders to stew about the projects, but worst of all, MNRF and MOECC staff continued to work on several files connected to these terminated FIT Contracts. This was a total waste of taxpayers' dollars. As a matter of fact, a renewable energy lead in MNRF suggested that he wasn't able to determine whether FIT Contracts had been terminated, and if I found out to please let him know.</p> <p>There must always be transparency surrounding active and terminated FIT Contracts, especially when it comes to key information such as proponent's name, fuel type, fuel location, number of MW, active/terminated.</p>
2.9	<p>If the IESO is to maintain an open and transparent process, a list of qualified applicants, as well as details of the number and type of renewable projects must be made available to the public upon the completion of the RFQ.</p>