



John Yakabuski
Legislative Building, Room 351
Queen's Park
Toronto, ON M7A 1A8

December 4, 2015

Dear Mr. Yakabuski,

Last month you introduced Bill 150, Energy Referendum Act, 2015 in the Ontario legislature. The Ontario Energy Association (OEA) has reviewed your Private Member's Bill, and in response to a number of concerns raised by our members I am writing to provide you with some comments and recommendations.

This bill proposes to allow municipalities to hold referendums on the development of large-scale renewable energy projects. The OEA would like to emphasize that this proposal is inconsistent with good energy planning practices. As the OEA has repeatedly stated in the past, referendums are not the way to plan energy infrastructure – or, for that matter, any large infrastructure project. Rather, as we have previously shared with you¹, the OEA supports integrating energy plans and applicable municipal plans (e.g. zoning and land use plans). As you know, municipalities do not currently have any explicit obligations to plan for the development of electricity infrastructure to meet the needs of their communities – though such an obligation does exist for both sewage and water services.

As you may recall, the OEA's Energy Platform (recommendation one)² recommends that all energy policy decisions should be transparent and preceded by fulsome public consultations. The OEA also believes that power system planning should be carried out by the technical experts at the IESO – individuals who have highly specialized knowledge of, and in many cases decades of experience with, system planning. Effective and inclusive consultation is a vital part of infrastructure development, but local communities cannot have a veto over energy infrastructure development – especially when, due to gaps in the existing planning process, the municipality's own plans and the

¹ http://energyontario.ca/images/OEA_Submission_-_Regional_Energy_Planning_and_Siting.pdf

² http://energyontario.ca/images/ENERGYPLATFORM/OEA_Energy_Platform.pdf



Provincial Policy Statement might not adequately reflect a community's actual energy needs.

Singling out a specific form of generation, as in Bill 150, does nothing to address the need for strong planning for all forms of energy production and delivery in a way that would comprehensively reflect the needs of individual communities and of Ontario as a whole. I am pleased to enclose a copy of the OEA's submission on integrated regional energy planning in Ontario, which contains more detail on our thoughts and recommendations on this subject.

In addition, I would like to point out that while Bill 150 contains reference to projects developed under the IESO's feed-in tariff program as per section 25.35 of the Electricity Act, this section of the Act (and thus the entire FIT program) is proposed to be repealed by Bill 135, Energy Statute Law Amendment Act, 2015 that is currently before the legislature. Large renewable energy projects are now procured via the IESO's large renewable procurement (LRP) process, which, as you may know, has extensive community engagement and willing-host requirements.

If you have any questions or would like to further discuss the OEA's positions on Bill 150 please contact myself or Tina Arvanitis, Vice President, Government Relations & Communications, at 647.920.3269 or tina@energyontario.ca. We look forward to hearing from you.

All the best,

A handwritten signature in blue ink, appearing to read "B. Huggard", is written over a light blue horizontal line.

Bob Huggard
President & CEO
Ontario Energy Association