

Draft LRP I RFP, draft LRP I Contract, and draft Prescribed Forms: Feedback Form

Feedback on the draft documents must be sent to LRP@powerauthority.on.ca by **December 19, 2014**. 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
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3.2.4	<p>Community Engagement. Clearly defined minimum community engagement requirements should be established here to provide transparency on how proponents' community engagement plans are being evaluated and weighted in the review. There is a great deal of prescriptiveness articulated in b) through d) in this section but a) is too vague to allow for meaningful comparison as it does not articulate minimum requirements of engagement best practices. Subsection a) needs to be further defined and we recommend including the requirements in Section 3.3.1 here as mandatory efforts and not included for bonus points (see more on this below in the appropriate section).</p> <p>We further recommend that the community engagement plan include an articulation of the type of community benefits models being proposed. Several different types of Community Benefit Models (CBM) have been tried and tested around the world to ensure community compensation measures balance the costs and benefits of projects at the local level. A mutually agreed CBM is an important consideration for increased local support of a large RE projects. There are many different forms these can take and its important these are agreed with the community, but at a minimum, the community engagement plan should articulate the anticipated CBM and the value of it to the community. For a review of CBMs please see TREC, 2014 (full reference below) by contacting james@trec.on.ca - this report has been previously submitted to the OPA as part of the LRP consultation but none of its recommendations reflected in the draft contract.</p>
3.3	<p>Rated Criteria. The criteria by which proponents are being rated is too limiting and the weighting of points too heavy on community engagement when those engagement activities should be included as mandatory minimum requirements under 3.2.4. Refer to section above about a Community Benefits Model.</p> <p>The missing criteria in this section is Community Participation which means a project demonstrates economic interest by a co-operative corporation where a co-operative corporation is a legal entity owned by its members, as defined in the Co-operative Corporations Act, RSO 1990, c C.35, with its head office located in Ontario, all of whose members are Co-op Members Resident in Ontario.</p> <p>The involvement of Ontario residents in large renewable energy projects is important for local economic development and for project acceptance as demonstrated in many jurisdictions around the world and quantified in various studies (see references below). The point allocation should be as follows: 50 points for Aboriginal participation and 50 points for community (co-op) participation. The amount of points should be informed by the level of Aboriginal and Community participation in the later two cases.</p> <p>The OPA should also consider further incentivising community and aboriginal participation through a price adder - e.g. range of 0.5 - 2 cents per kWh depending on the level of community/aboriginal participation being enabled. Community (i.e. co-op) and Aboriginal partners bring a great deal of value to the project and to the Ontario power system overall by acting as front-line educators, however, those activities have a cost and should be compensated through the procurement price and those benefits must be passed on to the community/aboriginal partner.</p> <p>These amendments to the contract would put Ontario in-line with best-practices in other jurisdictions, in particular those jurisdictions that have had the greatest growth and public acceptance of wind and other large RE technologies.</p>
3.3.1	<p>RECOMMENDATION: Remove Community Engagement from the rated criteria eligibility and move the requirements articulated in 3.3.1 into Section 3.2.4. RATIONALE: Comprehensive effort at Community Engagement as articulated in section 3.3.1 should be a mandatory requirement for all proponents and not be eligible for bonus points. If proponents can demonstrate evidence of achieving the requirements articulated in 3.3.1 they can be ranked accordingly. This speaks to the need for more transparency on how Section 3.2.4 will be judged (see comments in that section).</p>

3.3.2	Aboriginal participation. See recommended enhancements to this component in Section 3.3 above.
3.3.3 Recommended addition	Community participation be included as a Rated Criteria. Evidence from multiple sources, perspectives and jurisdictions shows that community participation is an important and often essential feature for wind project acceptance and support (see references below). Moreover, offering local communities and/or individuals direct economic interest provides additional economic development benefits to a region. The FCPC firmly recommends economic interest by a co-operative and/or Aboriginal community be a minimum requirement for all wind and other large RE projects in Ontario. Project proponents and their community and/or Aboriginal partners should be given some discretion as to the nature of the relationship between them, but all RFP respondents should be required to submit an Economic Interest form that articulates the level of community/aboriginal participation and a summary of the proposed relationship between the parties. Such a plan should be included in the rated criteria with a scaled ranking that reflects higher points for a higher level of participation. A suitable substitute for this is clear evidence of efforts to secure a partner. One form of evidence demonstrating reach out to the co-op sector is evidence of soliciting a partner through the Federation of Community Power Co-ops (FCPC). The FCPC in-turn can solicit its members for interested co-op partners in a particular project.
REFERENCES SUPPORTING THESE RECOMMENDATIONS	Health Canada (2014). <i>Wind Turbine Noise and Health Study</i> . Health Canada. Available on-line: http://www.hc-sc.gc.ca/ewh-semt/noise-bruit/turbine-eoliennes/summary-resume-eng.php?mkt_tok=3RkMMJWWfF9wsRolvKjNZKXonjHpfsX56e4oWq6%2FIMI%2F0ER3fOvrPUfGjl4ESMVi%2BSDLwEYGJlv6SgFS7jNMbZkz7gOXRE%3D
	Lantz, E. and Tegen, S. (2009). <i>Economic Development Impacts of Community Wind Projects: A Wind Review and Empirical Evaluation</i> . National Renewable Energy Laboratory.
	TREC (2014). <i>Empowering Communities: invigorating community participation in Ontario wind development</i> . TREC Renewable Energy Co-operative.
	Walker, C., Baxter, J. & Oullette, D. (In Press). <i>Beyond rhetoric to understanding determinants of wind turbine support and conflict in two Ontario, Canada communities</i> . <i>Environment and Planning A</i> .
*ABOUT THE FCPC	The Federation of Community Power Co-operatives (FCPC) is a province-wide umbrella organization for community power co-ops in Ontario that are developing grid-tied renewable energy projects. We exist to unite, represent and serve the community power co-op community across the province.
	The FCPC was created by co-ops for co-ops to enable co-operation and mutual support within the sector and to expand the opportunity of individuals and communities to benefit from Ontario's growing renewable energy sector.
	It is our goal to increase the number of renewable energy co-ops developed at the highest possible standards by establishing best practices and sharing resources.
	The FCPC represents more than 20 community power co-operatives and 99% of co-ops building RE projects under the FIT 2 and 3 contract capacity set-aside.

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