



HEALTHY COMMUNITIES • SUSTAINABLE COMMUNITIES

July 12, 2013

Ms. Julia McNally  
Director, Market Transformation  
**Ontario Power Authority**  
Suite 1600  
120 Adelaide Street West  
Toronto, ON M5H 1T1

**Consultation on Regional Planning and Siting of Large Energy Infrastructure**

Dear Ms. McNally,

We would like to thank you and your colleagues for meeting with representatives from the Ontario Professional Planners Institute (OPPI) on July 2, 2013 and for listening to our input regarding the above noted consultation process. This letter comprises a follow-up submission which is intended to summarize input from OPPI members who are actively involved in energy planning issues on behalf of proponents, municipalities and communities.

OPPI is the recognized voice of the Province's planning profession. Our almost 4,000 members work in government, private practice, universities, and non-profit agencies in the fields of urban and rural development, urban design, environmental planning, transportation, health, social services, heritage conservation, housing, and economic development. Our Members meet strict practice requirements and are accountable to OPPI and the public to practice ethically and to abide by a Professional Code of Practice. Only Full Members are authorized by the Ontario Professional Planners Institute Act, 1994, to use the title "Registered Professional Planner" (or "RPP").

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OPPI's submission is provided from the perspective of planning practitioners who recognize that energy-related infrastructure is essential to support growth over the long-term and that renewable energy is an essential component of the future supply mix. At the same time, facilities required for energy generation and transmission often raise environmental and community concerns, to the extent that current processes have lost credibility in some quarters.

Professional planners have an important role in energy planning and facility siting, especially in coordinating and integrating specialist input to planning processes, engaging with communities, promoting compatibility between facilities and sensitive land uses and ecosystems, and working with municipalities and other government agencies.

The following summarizes the input we wish to provide at this stage of the process:

- The distinction made in Section 62 of the Planning Act as to whether it applies to Ontario Power Generation (OPG) and Hydro One versus private sector (or municipal) projects approved under the Environmental Assessment Act should be re-examined with a view to enhancing consistency and municipal involvement, while limiting opportunities for political intervention at the provincial level. Overall, electricity planning and siting should be distanced from the political realm;
- The applicability of the Provincial Policy Statement (PPS) to energy (and other) infrastructure planning under the Environmental Assessment Act should be clarified to specify whether EAs must be consistent with the PPS;
- We are pleased to learn that the government is working again on a province-wide plan that would form the framework for regional planning;
- There is already a history of municipal engagement in energy planning processes, for example the North York Region Electricity Supply Study. Care should be taken to ensure that the outcome of such processes reflects values beyond the balance of power among the municipalities involved;
- At the regional level, there is an opportunity to align regional energy planning areas with provincial planning areas (such as the Greater Golden Horseshoe) and other area-based planning initiatives such as the Southwest Economic Alliance;
- Municipal engagement and support is more likely when an identified gap in energy provision potentially affects local or regional growth. It is less likely when municipalities see few local benefits in being part of a Province-wide solution;
- Both planning and engineering components of municipalities need to partner with Local Distribution Companies (LDCs) and aboriginal groups in contributing to regional planning processes, however, constraints on resources at the municipal level should be recognized and addressed;

- Municipal engagement in the process has to be real, with consideration given to both a financial stake and planning/zoning powers. Prioritization points for municipal equity positions should extend beyond renewables to other large-scale generation projects;
- There should be a return to public hearings for major projects (in addition to Renewable Energy Approvals - REAs) to restore independent scrutiny and to enhance credibility;
- Consider establishing “community stakeholder working groups” to provide an opportunity for local stakeholders to have more meaningful, ongoing participation and input into decisions that directly affect them and a place to discuss and address any community issues and concerns related to large-scale energy projects. It is not intended that the group would have decision-making authority nor does it require consensus to proceed. The group would be guided by principles that would offer a more transparent approach to siting;
- Stakeholders should be involved in decisions on all options, including those affecting centralized versus distributed energy generation, conservation versus generation, supply mix and siting;
- Experience demonstrates that siting of discrete facilities such as gas plants requires a stronger planning element. Planning and permitting should be driven by consultation, best practices in siting, consistent criteria and a comparative approach, rather than comprising a “risk management” element in a procurement process. An entity such as the OPA or MOE should oversee an inclusive site selection process, resulting in a preferred site and design parameters that would form the basis for procurement;
- It is important to do groundwork on the culture and character of a community and its past experience with and reliance on large-scale infrastructure projects, to form the basis for community-specific approaches to facility siting;
- Some municipalities have already undertaken studies to guide Official Plan policies on siting for generation facilities (e.g. Town of Oakville, Township of King);
- Wind farm siting and planning requires a proactive approach to restore lost credibility. A backlog of Feed-in Tariff (FIT) contracts will result in a further time lag. Future processes should engage the entire affected community, with free flow of information, a shared sense of responsibility and benefits, and property value protection;

- There is an opportunity to harness energy potential in northern Ontario, however, this will require transmission reinforcement and difficult planning processes;
- The current move towards engaging aboriginal groups as partners in energy solutions (both generation and transmission) is beneficial and important;
- Limitations on the mandate of municipalities and LDCs should be eased to expand the scope of locally initiated energy solutions including district energy;
- Undervalued opportunities for green energy such as landfill gas, biogas, biomass and energy from waste should be further explored and supported;
- We support the overall objectives of the Quest group that municipal energy planning should be considered to include community energy planning and integrated community energy systems such as district energy, and use of thermal energy such hot and/or chilled water, with a view to reducing energy use, fuel consumption, costs, and greenhouse gas emissions. Provincial policies and resource allocation should be supportive of these initiatives.

Our representative at your meeting scheduled for July 24, 2013 would be happy to expand on our comments and the way these relate to your draft recommendations. For further information, please don't hesitate to contact me at 416-668-8469 or by e-mail at [policy@ontarioplanners.ca](mailto:policy@ontarioplanners.ca)

Sincerely,

A handwritten signature in black ink, appearing to read 'L. Ryan', followed by a horizontal line.

Loretta Ryan, MCIP, RPP, CAE  
Director, Public Affairs