



April 27, 2012

MicroFIT Submissions Coordinator
microFITsubmissions@powerauthority.on.ca

Re: Conservation Ontario's Comments on Draft microFIT Rules and Contract

Attention microFIT Submissions Coordinator:

This letter is being submitted on behalf of Ontario's 36 Conservation Authorities (CAs). Conservation Ontario is the network of Ontario's CAs which are community-based watershed management agencies dedicated to conserving, restoring and managing Ontario's natural resources on a watershed basis. Ninety percent of Ontario's population lives in a watershed managed by a Conservation Authority.

As community-based watershed management agencies Conservation Authorities are an ideal choice to showcase the benefit of green energy. microFIT projects are the most appropriate selection for use on CA administrative buildings, outdoor education facilities, and in their Conservation Areas due to the size of the project(s) and the streamlined application and review process. Given their community focus, non-profit status, educational programs and unique relationship with their municipal partners, CAs appear to meet the intent of both the current and proposed "Eligible Participant Schedule". Conservation Ontario has previously submitted letters to the microFIT Program Advisory Panel (April 4, 2011) and the Ministry of Energy (December 15, 2011) providing the strong rationale for CA inclusion on the "Eligible Participant Schedule".

Conservation Authorities have consistently committed to supporting the Province's green energy and green economy agenda as well as their climate change mitigation strategy. Due to this level of commitment, it is extremely disappointing that Conservation Authorities continue to be ineligible to participate in the microFIT program. Conservation Ontario is concerned that Conservation Authorities are being told that they are an important partner in the green economy and yet barriers to effective partnership, such as ineligibility, are being kept in place.

We look forward to the inclusion of Conservation Authorities on the "Eligible Participant Schedule" for the microFIT program to facilitate Conservation Authority efforts to support the green economy. Should you have any questions or would like to discuss this matter further, please contact myself at 905-895-0716 ext 231 or Bonnie Fox at extension 223.

Sincerely,

Don Pearson
General Manager

Attachment: microFIT Feedback Submission Form

c.c. CAOs/GMs of Ontario's 36 Conservation Authorities

P.O. Box 11, 120 Bayview Parkway Newmarket Ontario L3Y 4W3
Tel: (905) 895-0716 Fax: (905) 895-0751 Email: info@conservationontario.ca

microFIT Rules, Contract and Eligible Participant Schedule Feedback Submission Form

Completed forms should be sent to microFITsubmissions@powerauthority.on.ca. Please identify the section number of the rules and contract you are providing feedback on. Note that there are separate sections for feedback on the rules, contract and eligible participant schedule. Feel free to add additional rows to the form.

Note that there is a separate form for FIT submissions – please refer to the FIT website for more information – FIT.powerauthority.on.ca

Optional Information:

Name: Leslie Rich, Policy and Planning Officer

Company: Conservation Ontario

microFIT Rules

Section	Feedback
2.1 (b)	<p>“To be eligible to submit an Application and to be offered a microFIT Contract, the Applicant must be an Eligible Participant”.</p> <p>As outlined in Conservation Ontario’s letters of April 4, 2011, December 15, 2011 and April 27, 2012 it is recommended that the Eligible Participant Schedule be amended to include Conservation Authorities.</p>



April 27, 2012

FIT Submissions Coordinator

FITsubmissions@powerauthority.on.ca

Re: Conservation Ontario's Comments on Draft FIT Rules and Contract

Attention FIT Submissions Coordinator:

This letter is being submitted on behalf of Ontario's 36 Conservation Authorities (CAs). Conservation Ontario is the network of Ontario's CAs which are community-based watershed management agencies dedicated to conserving, restoring and managing Ontario's natural resources on a watershed basis. Ninety percent of Ontario's population lives in a watershed managed by a Conservation Authority. Conservation Ontario has also submitted comments on the draft microFIT Rules and Contract, providing the strong rationale for CA inclusion in the "Eligible Participant Schedule".

Conservation Ontario supports the province's efforts to foster the growth of the green economy. As community-based watershed management agencies Conservation Authorities are an ideal choice to showcase the benefit of green energy. Through the review of the draft FIT Rules and Contract some concern was raised about potential barriers to full CA participation in the province's efforts. For example, with the new "priority points system" CAs may be at a disadvantage with regard to the scoring system, due to change in definition of what constitutes community participation projects. Under the previous FIT rules, CAs could qualify for community participation projects through their Foundations; under the proposed FIT rules, this option is no longer available. Those projects which are not community participation projects also have to pay a higher application fee.

It is of particular importance that barriers to full CA participation in the FIT program be removed, given their current inability to participate in the microFIT program. In the accompanying FIT feedback submission form, Conservation Ontario staff have noted potential barriers to CA participation including the Priority Points System, the definition of Community Participation Projects and the higher application fees for those who do not qualify for Community Participation Projects. Given their community focus, non-profit status, educational programs and unique relationship with their municipal partners Conservation Authorities are in a critical position to forward the Province's green economy and green energy agendas.

Thank you for the opportunity to provide comments on the draft FIT rules and contract. Should you have any questions or would like to discuss this matter further, please contact myself at 905-895-0716 ext 231 or Bonnie Fox at extension 223.

Sincerely,

Don Pearson
General Manager

Attachment: FIT Feedback Submission Form

c.c. CAOs/GMs of Ontario's 36 Conservation Authorities

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FIT Rules, Contract and Standard Definitions

Feedback Submission Form

Completed forms should be sent to FITsubmissions@powerauthority.on.ca. Please identify the section number of the rules, contract and standard definitions you are providing feedback on. Note that there are separate sections for feedback on each of these documents. Feel free to add additional rows to the form.

Note that there is a separate form for microFIT submissions – please refer to the microFIT website for more information – microFIT.powerauthority.on.ca

Optional Information:

Name: Leslie Rich, Policy and Planning Officer

Company: Conservation Ontario

FIT Rules

Section	Feedback
3.1 (c)	<p>Application Materials and Requirements</p> <p>Conservation Ontario supports a reduced “Application Security” fee for Aboriginal and Community Participation Projects however under the proposed FIT rules, Conservation Authority Foundations will no longer be eligible under the Community Participation Project category. The higher “Application Security” fee will place Conservation Authorities at a disadvantage in their applications.</p>
6.1 and Figure 6.1: Priority Points Table	<p>Application Prioritization and Ranking</p> <p>As per Conservation Ontario’s attached letter, the proposed priority points table may disadvantage Conservation Authority applications, as under the proposed revised rules, Conservation Authority Foundations can no longer apply under the Community Participation Project category. Conservation Ontario recommends that the previous definition of Community Project be reinstated.</p>

FIT Contract

Section	Feedback
17.2 (i)	As per Conservation Ontario's letter, it is recommended that the previous definition of Community Investment Members be re-instated to allow Conservation Authority Foundations to undertake Community Participant Projects.

FIT Standard Definitions

Section	Feedback
52, 53, and 54	Community Participation Project (and accompanying definitions) Conservation Ontario recommends that the previous definition of Community Investment Members be reinstated for use in FIT 2.0. This will allow registered charities and not-for-profit organizations to continue to participate in this important program.