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Province Director  
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April 23<sup>rd</sup>, 2024

Jennifer Keyes  
Director, Resources Planning and Development Policy Branch  
Policy Division  
**Ministry of Natural Resources and Forestry**  
2<sup>nd</sup> Floor, South Tower  
300 Water Street  
Peterborough ON K9J 3C7

Dear Ms. Keyes:

**Subject: Environmental Registry of Ontario Policy Posting 019-8320**  
**Proposed Regulatory Amendment – Conservation Authorities Act**

Please accept this submission on behalf of Neoen regarding the Ministry's April 5, 2024 policy proposal to establish a new regulation specifying the circumstances under which the Minister may issue an order to prevent a conservation authority from making a permitting decision and make the permitting decision in the place of a conservation authority or may undertake a review of a conservation authority permitting decision.

Neoen is a fast-growing power producer, 100% focused on renewables, specializes in solar, wind, and storage solutions. After 15 years, Neoen is operating a global portfolio of 8 GW of projects across 16 countries, with significant presence in Australia, Europe, and the Americas. Neoen employs a "develop-to-own" strategy, which encompasses the entire project lifecycle from initial development and financing to construction and eventual decommissioning. Since establishing a local presence in Canada in 2022, Neoen has developed a diverse portfolio of solar and storage projects in Alberta, Ontario, and Saskatchewan at various stages of development. This includes a notable 93 MWp solar project currently in operation in Alberta.

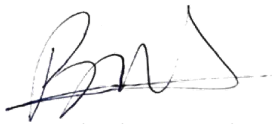
With the July 10, 2023 release of *Powering Ontario's Growth* [Powering Ontario's Growth | ontario.ca](https://www.ontario.ca/powering-ontarios-growth), the Province signalled a need and commitment to both procure new energy supplies and to enhance Ontario's transmission system. Since that time, the Ministry of Energy and the Independent Electricity System Operator (IESO) have been active in establishing energy procurement programs. Neoen is excited to be part of Ontario's growing energy sector and helping the Province realize its decarbonization objectives.

For this reason, we hereby wish to offer comments regarding the proposed new regulation to describe specific matters of “provincial interest” to which the Minister of Natural Resources and Forestry (MNR) may intervene in local conservation authority permitting.

While the proposed list describes a number of key areas of provincial interest, absent from this list is specific mention of “energy related infrastructure and facilities.” Given the provincial priority focus on securing Ontario’s future energy supply and its associated infrastructure (e.g. distribution and transmission facilities), we recommend that energy related infrastructure and facilities be added to this list of specific matters to which the Minister may intervene in conservation authority permitting.

Thank you for the Ministry’s consideration of this submission. If you have any questions or wish to discuss this matter, please do not hesitate to contact myself.

Yours truly,

A handwritten signature in black ink, appearing to read 'BPinot'.

Benoit Pinot de Villechenon  
Province Director  
Neoen Renewables Canada Inc.

c.c. Graydon Smith MPP, Minister of Natural Resources and Forestry  
Todd Smith MPP, Minister of Energy