

## **RE: ERO 025-1367 – Amending the Renewable Energy Approval regulation to remove certain project types from the process and streamline the review of Natural Heritage Assessments**

On behalf of Solvest Inc, thank you for the opportunity to provide comments on the Ministry of the Environment, Conservation and Parks' (MECP) proposal to modernize Ontario Regulation 359/09.

Solvest Inc. is a leading Canadian renewable energy provider specializing in the design, construction, and financing of solar power systems for remote communities and the mining sector. Central to our mission is a collaborative, Indigenous-focused business model where projects are developed through ongoing consultation with Indigenous partners and ultimately owned and operated by the participating Indigenous organizations. By combining technical innovation with accessible financing and a commitment to an Indigenous-focused ownership model, Solvest empowers communities across Canada to reduce their reliance on traditional fuel sources, achieve long-term financial independence, and lead the transition toward a more resilient and sustainable national energy grid.

As a leader in the renewable energy sector, Solvest is defined by our dual commitment to advancing Ontario's energy transition and upholding the highest standards of environmental stewardship. Our approach is rooted in the belief that clean energy development and environmental protection are not mutually exclusive, but rather complementary goals. We view regulatory compliance not merely as a hurdle, but as a fundamental responsibility to the communities and ecosystems in which we operate.

Solvest supports the proposed amendments in principle. We believe these changes will significantly reduce administrative duplication and provide the regulatory certainty required to accelerate the deployment of clean energy across the province, without compromising the environmental integrity that remains the cornerstone of our work.

### **Support for Exemptions of Ancillary Electricity Generation**

Solvest strongly supports the proposal to remove REA requirements for projects where electricity generation is ancillary to a facility's primary function (e.g., mining sites, hospitals, or manufacturing plants). These projects are relatively small at 500 kW to 15 MW with small project footprints and minimal environmental impact compared to the existing industrial site that has already undergone permitting or relative to large utility scale renewable energy projects built solely for investment purposes.

The primary purpose of a renewable energy project to support an industrial site is to improve economics making the entity more competitive, reduce greenhouse gas emissions, or in

most of the projects that Solvest develops, create a revenue stream and enhance capacity building for a First Nation project owner.

- **The Impact of Duplication:** Currently, integrated facilities often face a duplication of approvals. In our experience, the REA process for an ancillary project can add 12 to 24 months to a project timeline without providing additional environmental oversight that isn't already captured by previous approvals. This lengthy timeline is caused by seasonality of both project construction and REA studies and rigid consultation timelines that cannot overlap under current regulations.
- **Operational Benefits:** By allowing these projects to proceed under existing approvals, the Ministry reduces the regulatory friction that often discourages industrial partners from investing in solar solutions. This change would ensure oversight is focused where it is most effective while maintaining the rigorous standards found in existing ministry-reviewed permissions. Ultimately, more solar power projects could be built quicker – projects that support the profitability and global competitiveness of existing industrial production in Ontario.

### **Streamlining Natural Heritage Assessment via Qualified Persons**

The shift from a mandatory Ministry of Natural Resources (MNR) review to a system based on Qualified Person attestations is a significant step toward a more efficient, evidence-based oversight model.

- **Reducing Uncertainty:** The current MNR confirmation process can be a black hole for proponents, where unpredictable review timelines often lead to missed construction windows.
- **Qualified Professionals:** We endorse the use of Qualified Persons to prepare Natural Heritage Assessments and Bird/Bat Environmental Effects Monitoring Plans. We suggest the Ministry define a "Qualified Person" as an individual with a professional designation and a minimum of 5 years of experience in Ontario-specific natural heritage policy. This ensures that environmental safeguards remain robust by leveraging the professional accountability and ethical obligations of licensed experts.

### **Improving Regulatory Certainty and Project Timelines**

MECP has requested input on the real-world benefits of these changes. From Solvest's perspective, the primary benefit is faster development timelines, lower cost development, and reduced schedule risks.

- **Investment Certainty:** For many of our clients, the decision to greenlight a multi-million dollar renewable energy project hinges on the timeline to access funding, often including provincial or federal funding in the case of First Nation ownership alongside bank debt.

With current rigid timelines combined with construction seasonality, slipped schedules can delay projects increasing costs and delaying revenue generation.

- **Project Timelines:** When the proposed package of amendments is viewed as a whole, the removal of duplicative requirements and streamlining of approvals has the potential to significantly reduce timelines and expedite projects. Based on our current understanding of the proposals, we could see a potential timeline reduction of at least 12 months on an average solar project sized at 500 kW to 15 MW.
- **Project Savings and Reinvestment:** The proposed removal of duplicative requirements and streamlining of approvals will result in administrative and consultancy savings by eliminating the back-and-forth review cycles with the Ministry, allowing those funds to be reinvested into project technology and site-specific environmental mitigation.

### **Supporting Environmental Protection and Clean Energy Growth**

Ensuring a consistent and rigorous system of environmental standards and safeguards is critical. The proposed recommendations will enable projects that have already undergone environmental review and mitigation measures to advance more expeditiously, while continuing to ensure strict adherence to environmental standards.

At Solvest, we work across Canada with organizations looking to reduce their environmental footprint or build capacity remote communities with limited stable access to the electrical grid. Our technology allows for important development in regions that have traditionally struggled due to infrastructure challenges. By proposing these new regulatory amendments, the Government of Ontario is showcasing its commitment to the environment through clean energy and a continued rigorous environmental regulatory approval process, while reducing duplicative and unnecessary obstacles to project development.

We are encouraged by the government's commitment to making Ontario more competitive and are eager to act as a constructive partner in the implementation of these changes. We remain available to provide further technical feedback or project-based data to support the Ministry in this important work. Please don't hesitate to reach out to our team of subject matter experts if we can be of assistance.

Sincerely,

**Ria Fitzgerald, Director of Mining  
Solvest Inc.**