

Kristen Walli Board Secretary Ontario Energy Board boardsec@ontarioenergyboard.ca

January 10, 2013

RE: Generator Licence Application for SunE Norfolk Bloomsburg Solar Farm

Board File No. EB-2012-0467

Dear Ms. Walli,

The SunE Norfolk Bloomsburg Solar Farm is a 10 MW ground-mount solar PV (photovoltaic) project located in Norfolk County (the "PV Project"). The PV Project is being developed under Ontario's Feed-In Tariff (FIT) program. The contract specific information pertaining to the FIT Contract for the PV Project is as follows:

FIT Contract ID: F-000629-SPV-130-505

Legal Name of Supplier: SunE Norfolk Bloomsburg LP

FIT Contract Date: April 27, 2010

Application Reference Number: FIT-FM92H4L

Local Distribution Company: Norfolk Power Distribution Inc.

We are writing this letter to request that the OEB grant SunE Norfolk Bloomsburg LP an interim Electricity Generator License. The reasons for an interim license are because (a) the PV Project will be completed construction and technically ready for connection prior to the issuance of the Electricity Generator License, (b) the PV Project will accumulate significant additional construction finance costs as a result of commercial operation under the FIT Contract occurring significantly after completion of construction, and (c) a proposed sale of the PV Project will be significantly delayed.

Further, per the test set out in section 21(4)(b) of the Ontario Energy Board Act, 1998, we hereby request to have the proceeding disposed of without a hearing. SunE Norfolk Bloomsburg LP consents to disposing of the proceeding without a hearing and confirms that no other person will be adversely affected in a material way by the outcome of the proceeding.



The Commercial Operation Date (as defined under the FIT Contract) for this PV Project is scheduled for February 8, 2013. SunE Norfolk Bloomsburg LP has scheduled a Dead Zone Transfer Trip Test with Norfolk Power Distribution Inc. on January 16, 2013 for which we require an OEB Generator License.

As is typical for a solar project of this size, SunE Norfolk Bloomsburg LP has put in place a construction financing facility. This type of construction facility is common among development projects throughout the Province of Ontario. Having the PV Project sit idly post completion for any number of months will result in additional material interest costs. This will hamper the ability of developers to work with the Province of Ontario to reduce the cost of green energy projects such as the PV Project. In addition, and again as is fairly typical of solar development, we are currently making arrangements with an investment fund to purchase the PV Project upon Commercial Operation under the FIT Contract. Delaying the sale of a project such as the PV Project for several months results in a delay in the deployment of capital to future projects, which will add costs to those future projects.

Due to timelines outlined above, and the impacts of those timelines, SunE Norfolk Bloomsburg LP, respectfully requests that the OEB expedite the application review process and requests that the OEB issue an interim license to SunE Norfolk Bloomsburg LP for the SunE Norfolk Bloomsburg Solar Farm.

Please feel free to contact Courtney Searle (<u>csearle@sunedison.com</u> or 647-258-9076) if you have any questions with respect to this submission.

Sincerely,

Courtney Searle Program Manager SunEdison Canada

cc: Vince Mazzone, Ontario Energy Board

January 10, 2013 Page 2 of 2