**ONTARIO ENERGY BOARD**

Ontario Energy Board

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May 7, 2013

**Submission for:**

The Ontario Energy Board Application for Leave to Construct Transmission Facilities (EB-2013-0040)

As a resident of Lambton Shores, whose family farm will be impacted by NextEra’s Jericho Wind and Suncor’s Cedar Point Projects, I am very motivation in keeping myself educated on the details of these specific projects. Of particular concern is the limited and often confusing information from NextEra concerning the transmission route proposed from Kerwood Road to the Nairn site at the 500 kV line.

I am addressing three significant matters in this letter: community consultation; the proposed construction date as indicated in NextEra’s OEB application; and the erroneous information contained in the OEB application for the Suncor’s Cedar Point Project.

1. **Community Consultation**

The proponent claims to have carried out a comprehensive stakeholder consultation program in the context of the REA process. From the perspective of the community, this claim is inaccurate.

There was only one community consultation meeting that dealt specifically with the Parkhill Interconnect Transmission Route. This occurred in the municipality of North Middlesex, in the town of Ailsa Craig, on November 10, 2011 (Appendix A). This meeting was to address the changes in the transmission route and consisted of an open house with boards on stands situated throughout the room where residents could wander through and ask questions. The proposed transmission route was simply laid out for community observation, not to elicit discussion, comments or suggestions. Since there was never a ‘formal’ presentation made to the community many residents were unsure of the format and did not know what questions to ask. This was true for all other open houses held on the Jericho Wind project, in which the transmission route details remained unclear to the community.

Below are examples of questions that were frequently asked by residents and typical answers received from NextEra representatives:

Q - will the transmission route be underground or overhead?

A – we don’t know right now.

Q – how tall will the poles be?

A – between 60 – 100’.

Q – any idea which?

A – no.

Q – what will the poles be made of?

A – wood, steel, or cement.

Q – any idea which?

A – no.

Q – Is this route confirmed to be the one that will be used?

A – yes, as long as it receives approval.

Further, the community in Lambton Shores was not provided with adequate consultation on the Jericho Project and the Parkhill Interconnect. The venue of the final open house to be held on February 8, 2013 was changed only two days before to a different town, leaving many residents unaware of the change; and there was a severe snow storm the evening of February 8th, making it nearly impossible for most residents to attend. The MOE was notified of this problem numerous times, by residents demanding that another final meeting be held. To date the MOE has still not addressed this issue (Appendix B).

The reality is communities have had very little input into the proposed transmission route. Additionally, finding information was also made more complex since it could be located on any of the three project websites. The three sites did not and still do not carry the same data for the Parkhill Interconnect. For example, visual simulations of this route are still not available in the Jericho Wind Project documentation on the proponent’s website. I had to hunt for it and eventually found it in the Bornish documentation. One would have thought that since the Parkhill Interconnect forms part of the Jericho REA that all pertinent documentation would be included on that website. In order to locate all available documentation on the Parkhill Interconnect I have had to research four different and complex wind projects! This is an unrealistic burden to place on residents’ time.

In fact, I became so confused with the transmission route NextEra was proposing that I wrote to the Ministry of the Environment on December 5, 2012. And again on Jan 14, Jan 31, Feb 12, and March 4. I also initiated two telephone conversations with MOE representative Ms. Narren Santos on March 3 and April 11 asking when my e-mails would be responded to. Ms. Santos was unsure when this would occur. To date I have still not received even an acknowledgment of my e-mail from the MOE. Here is the content of my e-mail from December 5th (Appendix C):

Today, while reviewing the Jericho documents on-line, I came across a document entitled, "Parkhill Interconnect Renewable Energy Approval Application Project Description Report", the initial version was dated June 5, 2012 while the updated version showed November 5, 2012. See attached link, Appendix A, around page 32. (I just went to NextEra's website to copy the link but the documents did not show up?! This has happened to me several times since the documents were posted, making it very challenging to access them).

<http://www.nexteraenergycanada.com/pdf/jericho/Jer_D%26O_Rpt_Draft_Part2.pdf>

I reviewed two Draft Project Description Reports for the Jericho Project, dated June 2012 and November 4 2012, and neither mentioned the Parkhill Interconnect Project. It simply calls that transmission route the 'Proposed Transmission line from Bornish Switchyard to Parkhill TS." I have a number of question concerning this 'new' project .....

- Is this a separate Renewable Energy Project from NextEra's wind projects (Adelaide, Bornish and Jericho)?

- Does it have its own REA number?

- When was this project approved?

- When was the public officially notified of this project?

- Is this project subject to the same public consultation process as other RE projects?

- Are studies to be conducted for this project (e.g. archeological, heritage)? If so, when will they be available? The Parkhill Interconnect Report, page 13, Section 4 entitled, "Environmental Effects Monitoring Plan" suggests that these reports will be part of the complete REA Application package.

Additionally, trying to locate the most updated documentation on the proponent’s website is quite challenging. I spent many hours going through all the Jericho Project documentation that I thought was complete only to find at the next open house, much of the information had been changed. Nowhere on their website do they indicate when and where updates or changes have been made, so one must go through 1000’s of pages again to discover the latest documents.

1. **Ontario Energy Board (OEB) Application**

The two issues surrounding the OEB application include information on the Suncor Cedar Point Wind Project and the proponents anticipated construction date for the transmission route.

Suncor Project Information

The Customer Impact Assessment (CIA) Addendum page 370 contains many errors with respect to the project information as it relates to Suncor’s Cedar Point Project. A summary of the key points follows:

* the location of the Cedar Point Project has been shown as Adelaide-Metcalfe.  It is actually located in the municipalities of Plympton-Wyoming, Lambton Shores and Warwick;
* the number of turbines is shown as 45, while Suncor documentation shows 46;
* the location of the Suncor substation is shown as being in the municipality of Adelaide-Metcalfe.  It is in Lambton Shores at Fuller and Cedar Point Roads;
* the power from the turbines (34.5 kv) through the transformer is shown to result in 121 kv.  According to Suncor it is transformed into 115 kv; and
* the transformer identified in the application shows one 120/34.5 kV, 66/88/110 MVA transformer, while Suncor is proposing to use two Waukesha 35/47/62 MVA transformers.

Here is a portion of the relevant Suncor reference that can be found in its entirety at:

<http://www.suncor.com/pdf/CedarPoint_Draft_Design_Operations_Main_Report_20130121.pdf>

Suncor Energy Products Inc. (“Suncor”) is proposing to develop the Suncor Energy Cedar Point Wind Power Project (the Project) **within the Town of Plympton**

**-Wyoming, the Municipality of Lambton Shores, and Warwick Township all within Lambton County, Ontario.**

It is envisioned that the proposed Project will include up to **46 wind turbines**.  Suncor is using Siemens 2.3-113 series wind turbine generators.  The wind turbines of this series have a maximum rated output of 2.2 MW, 2.1 MW or 2.0 MW.  They haven't decided which size to use yet.  
  
3.4  .... underground and/or overhead collector circuits carry the electricity to the Project’s **substation at Fuller Road and Cedar Point Line.**

3.6    A **115 kV overhead and/or underground transmission line** will be installed between the Project’s transformer substation (near Fuller Road and Cedar Point Line) and a proposed substation to be built as part of the Jericho Wind Energy Centre (located near Jericho Road as shown in the Site Plan).  The transmission line will connect to the high voltage side of the Jericho substation via a 115 kV circuit breaker. The transmission line would be approximately 15 km in length.

Anticipated Date of Construction

Exhibit B, Tab 1, Schedule 1, page 6, paragraph 16 of the OEB application acknowledges that the co-owners (Jericho, Adelaide and Bornish) are each subject to the requirements of the Renewable Energy Approval (REA) process. The proponent’s legal representative describes the Bornish timeline which ends with the anticipated approval date of April 13, 2013 (Appendix D).

Paragraph 8 acknowledges that subject to receipt of the REA, as well as other necessary permits and approvals, the Applicants plan to commence construction of the Proposed Transmission Facilities in August 2013.

This document (page 3, paragraph 6) defines the Proposed Transmission Facilities as including:

b) a 115 kV switching station, known as the Bornish Customer Switching Station;

d) an approximately 12.6 km single circuit 115 kV transmission line;

e) a 500 kV transformer station consisting of two 500/115 kV 135/180/225 MVA transformers, known as the Parkhill Customer Transformer Station or Parkhill CTS.

According to the Jericho Wind Project documentation (Appendix E), this transmission route is part of that application. This has also been confirmed through correspondence with the Ministry of the Environment, which states the Parkhill Interconnect Project is part of the proposed Jericho Wind Energy Centre and is not a separate project (Appendix F).

Since the Jericho Project documentation was just submitted to the MOE in February, it seems unlikely this project, including the Parkhill Interconnect Project, will receive the required approval by August 2013. **The construction of this transmission route should not begin until the Jericho Wind Project has received its REA.**

Thank you for considering my remarks when reviewing the OEB application. Should you require any additional information, please do not hesitate to contact me.

Sincerely,

Marcelle Brooks

