

**From:** [BoardSec](#)  
**To:** [REDACTED]  
**Subject:** FW: Letter of Comment Submitted: EB-2013-0203  
**Date:** August 26, 2013 10:50:26 AM

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**From:** Webmaster  
**Sent:** August-25-13 8:13 PM  
**To:** BoardSec  
**Subject:** Letter of Comment Submitted: EB-2013-0203

## LETTER OF COMMENT

### Comments:

Regarding the fact that The Niagara Region Wind Corporation has applied to the Ontario Energy Board (OMB) to build a high voltage transmission line.

I would like to address the issue of “The interests of consumers with respect to prices and reliability and quality of electricity service”

The OEB is an independent regulatory agency MANDATED to protect the interests of consumers with respect to the price, adequacy, reliability and quality of electricity service. It is responsible for promoting ECONOMIC EFFICIENCY AND COST EFFECTIVE generation, transmission and distribution of electricity in Ontario.

According to the 2011 Auditor General's Report the two expert agencies providing the checks and balances for the supply of electricity in Ontario are - the OPA as energy planner and the OEB as regulator. Decisions are to be made transparently and objectively! The GOAL is for consumers to get reliable, affordable and sustainable power; and that any energy plan is economically prudent and cost-effective.

The suspension of the Ontario Power Authority independent regulator's review means that there is no independent assessment to ensure that decisions are made in an economically prudent and cost-effective manner.

According to the 2011 Auditor General's Report (p. 97)

Ø billions of dollars were committed to renewable energy without fully evaluating the impact, the trade-offs, and the alternatives through a comprehensive business-case analysis.

Ø No independent, objective, expert investigation has been done to examine the potential effects of renewable energy policies on price, job creation, and greenhouse gas emissions.

Ø No thorough and professional cost/benefit analysis has been conducted to identify cleaner, more economically productive, and cost effective alternatives to renewable energy, such as energy imports and increased conservation.

Because wind power is an intermittent and unpredictable resource, integrating renewable energy into the operation of Ontario's power system can compromise the reliability, stability,

and efficiency of the system. Operational challenges include power surpluses and the need for backup power generated from other energy sources to maintain a steady reliable output. Wind and solar are not reliable, not efficient and not stable so why is the OEB continuing to focus on systems that will compromise of the electricity system of Ontario? Hydro is a renewable energy resource that is reliable, efficient, stable and inexpensive.

The IESO has confirmed that consumers have to pay twice for intermittent renewable energy - once for the cost of constructing renewable energy generators and again for the cost of constructing backup generation facilities. Your mandate is to protect the interests of consumers. How is having consumers pay twice for surplus energy that is then dumped at a loss protecting my interests? How is this cost effective?

Electricity demand has declined since 2005 due to the economic downturn, conservation and declines in the auto, pulp and paper industries. The OBE analysis completed in April 2010 concluded that, by 2016, electricity supply will far exceed demand. Given that demand growth for electricity has declined at the same time as more renewable energy is being added to the system, electricity ratepayers will have to pay renewable energy generators under the FIT program between \$150 million and \$225 million a year NOT to generate electricity! The OEB is an independent regulatory agency MANDATED to protect the interests of consumers with respect to the price, adequacy, reliability and quality of electricity service. Just do your job - Please explain how continuing with the renewable energy program protects the interests of consumers?

Wind generators operate at 28% capacity factor but have only 11% availability at peak demand due to lower wind output in the summer. Example August 16, 2013 according to the IESO Generator Output at 11:00 AM today - a peak demand time - the Capability of WIND was 1728 MW but the Output was 19 MW or 1.1% . Coal was virtually shut down with an Output of 1 MW.

Hydro - the greenest, cheapest renewable energy had a Capability of 7441 MW with an Output of 4475 MW or 60% of the capability. Could hydro have been ramped up to provide another 19 MW to cover the contribution of WIND?

Ontario is being put in the ludicrous position of spilling water to reduce electricity supply. Because the overall cost to produce hydro power is often lower than that of all other types of power, reducing hydro power to "make room" for wind and solar is an expensive mitigation strategy, particularly as HYDRO, wind and solar power are all considered renewable energy sources.

According to the 2011 Auditor General's Report, in 2010, 86% of wind power was produced on days when Ontario was already in a net export position. From 2005 to 2011, Ontario received \$1.8 billion less for its electricity exports than what it actually cost. How is this cost effective generation of electricity? How does this protect the interests of the consumers?

The Ministry of Energy claimed that the Green Energy Act would lead to "modest incremental increases in electricity bills of about 1% annually" yet in November 2010 the Ministry forecast that a typical residential electricity bill would rise about 7.9% annually over the next 5 years, with 56% of the increase due to investments in renewable energy. So we go from a 5% increase to a + 40% increase.

The OEB is an independent regulatory agency MANDATED to protect the interests of consumers with respect to the price, adequacy, reliability and quality of electricity service. It is responsible for promoting ECONOMIC EFFICIENCY and COST EFFECTIVE generation, transmission and distribution of electricity in Ontario. The OEB is a quasi-judicial tribunal that ensures consumers pay fair and reasonable rates for the electricity and natural gas they use. Neither the OEB nor the OPA was consulted about the agreement with the Korean Consortium. The Energy Minister, on behalf of the government, signed the \$7 billion Green Energy Investment Agreement (GEIA) with the (Korean) consortium. According to the Energy Minister the consortium agreement was neither a non-competitive procurement nor a sole-source deal. Instead, it is an “investment arrangement”. We lost that one in the World Court and the benefits of Ontario content disappeared too. According to the Auditor General Report the “normal due diligence process for an expenditure of this magnitude was not followed, neither ”a comprehensive and detailed economic analysis or business case had been prepared.” Nor was al Cabinet approval required.

Please, just do your job and protect the interests of Ontario electricity consumers. Do NOT approve of any additional transmission lines or associated facilities. The renewable energy initiative is driving industry out of this province due to increased energy costs, so it decreases job opportunities. Studies in other jurisdictions have shown that for every job created through renewable energy programs, about two to four jobs are often lost in other sectors of the economy because of higher electricity prices.

The renewable energy initiative allows private for profit - frequently multinational - corporations to control our energy resources; and because wind energy is intermittent and requires a backup system wind does not reduce the production of greenhouse gas. The renewable energy initiative is crippling our economy and will bankrupt this province.

Respectfully submitted

**Name:** Coreen Wierenga

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