



**County of Prince Edward
Engineering, Development and Works**

Edward Building, 280 Picton
Main Street, 2nd Floor

Mail to: 332 Main St, Picton, ON K0K 2T0

Tel: 613-476-2148

Fax: 613-471-2050

Email: rmcauley@pecounty.on.ca

21 November 2013

Ontario Energy Board
Attention: Mr. Robert Caputo, Project Advisor
Electricity Facilities and Infrastructure
2300 Yonge Street
P.O. Box 2319
Toronto, ON M4P 1E4

Via Email & Mail

Dear Mr. Caputo:

**Re: White Pines Wind Incorporated (WPD)
Leave to Construct Transmission Facilities, File EB-2013-339.**

The County of Prince Edward (County) is the host municipality for the White Pines Wind Incorporated (WPD) Renewable Energy project and the road authority having jurisdiction related to the above application. We are advised that you are the designated Project Advisor for this file and so are addressing this correspondence to you for the file.

In our recent conversation we discussed that WPD has not yet posted public notice of their OEB application. You advised that submissions are being accepted notwithstanding notice may not have been published. Therefore we are sending this correspondence to preliminarily outline some of our concerns with this application. The County desires to place on the record its objection to the granting of this application at this time.

As required by their Renewable Energy Act (REA) approval process WPD met with County staff to outline their preliminary proposed power interconnection and transmission route. WPD desires to use certain public roads and assets under our jurisdiction for the laying of power transmission cables from their multiple wind turbine generation sites to the Picton Transformer site. When meeting with us WPD presented preliminary and rudimentary technical drawings lacking sufficient detail. The County noted a number of concerns to WPD and that we would be unable to render any formal decision on their proposed interconnection route due to the lack of sufficient detail.

The proposed interconnection route involves the use of Crown surveyed, forced and Court of Quarter Session roads. Road widths, road ownership, in-situ obstacles, tree cover, proposed road crossings and the proposed use of County bridges to "hang" the cables are all a concern for The County. At this time WPD has not filed full detailed plans for our review. Frankly we were surprised to learn they had filed the OEB application instead of meeting with us further. Therefore, as the road authority having jurisdiction, the County is unable to consent to the WPD proposed work or approval of the OEB application as we do not agree to grant the use of County roads for the proposed work.

Furthermore, as part of their REA application, WPD had filed a draft Heritage Assessment Report purporting to evaluate local heritage assets along the proposed interconnection route and risks due to WPD's proposed construction. There are a number of heritage assets identified along the proposed interconnection route, and as penetration of bedrock is proposed in many locations, vibration and other types of collateral damage could result from the proposed work.

We are of the opinion that the draft Heritage Report as filed is lacking in detail. We have been made aware that an updated Report was filed recently with the Ministry of Culture, Tourism & Sport. However despite requests the County has been unable to obtain a copy of this updated Heritage Report. As a result we are unable to adequately assess the potential extent of damage that may be caused to our heritage assets due to the proposed work. The County is unable to consent to the proposed WPD work or the approval of the OEB application as we perceive unacceptable damage to County heritage assets may result.

We are concerned generally with the filing of the OEB application by WPD at this time. WPD has not yet completed the REA approval process, and in fact has not yet been deemed a complete application by the Ministry of the Environment. We are advised by that Ministry that a six month window of review is available once completeness of the REA application is accepted. Therefore, certainty of any REA approval, and thus the power interconnection and transmission route required, may be as much as six months away! It is our submission that the OEB is not pressed to make a decision on this application at this time, and may risk approving wrong or unnecessary works. This same risk exists to the County in considering any request to approve the use of our roads in advance of the REA approval. The County is unable to consent to the proposed WPD work or the approval of the OEB application as the WPD REA application is still incomplete and could change, be revised or outright denied as a result of the Ministry of the Environment REA process.

This letter is not our full submission, as information we require is not yet available to the County. We do intend to make a written submission to the OEB once public notice of the WPD application is published and a formal hearing has been ordered by the OEB. In the event that this matter proceeds to a hearing before the OEB the County requests that the OEB grant the County intervener status in this application. We also request that we be copied on all correspondence related to this file.

We thank you for the opportunity to express our position. Should you have any questions, please contact the undersigned.

Yours truly,



Robert McAuley, P.Eng, C.B.C.O.
Commissioner Engineering, Development and Works

RM/dd

cc. Mayor Mertens & Members of Council
Merlin Dewing, C.A.O. , Commissioners and County Clerk
Prince Edward Heritage Advisory Committee
White Pines Wind Incorporated