

From: BoardSec  
Sent: April 21, 2014 9:49 AM  
To: [REDACTED]  
Subject: EB-2013-0442 FW: COMMENTS

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From: James Embrey [REDACTED]  
Sent: April-18-14 9:55 AM  
To: BoardSec  
Cc: Emi Embrey  
Subject: COMMENTS

COMMENTS - EB-2013-0442 FOR DETERMINATION OF LOCATION OF  
DISTRIBUTION FACILITIES WITHIN ROAD ALLOWANCES OWNED BY  
THE MUNICIPALITY OF KAWARTHA LAKES

To:  
The Board  
Ontario Energy Board  
P.O. Box 2319  
27th Floor  
2300 Yonge Skeet  
Toronto ON M4P 184  
Attention Board Secretary  
From: your contact information

Dear Members of the Board:

These comments are filed pursuant to Section 4.4 of the Ontario  
Energy Board Act under Stakeholder Input which states:  
“The Board shall establish one or more processes by which  
consumers, distributors, generators, transmitters and other persons  
who have an interest in the electricity industry may provide advice  
and recommendations for consideration by the Board. 2004, c. 23,  
Sched. B, s. 4.”

This submission is in support of the intervenors and a request  
that the application EB-2013-0442 FOR DETERMINATION OF  
LOCATION OF DISTRIBUTION FACILITIES WITHIN ROAD  
ALLOWANCES OWNED BY THE MUNICIPALITY OF KAWARTHA  
LAKES originally filed on January 27th, 2014 and then re-filed on  
March 28th, 2014 be set aside. The Ontario Energy Board is  
statutorily obliged to ensure that any proposed work is in the public  
interest and in the interest of consumers with respect to the reliability  
and quality of the electricity services as well as to ensure generation  
of electricity from renewable energy sources is in a manner  
consistent with the policies of the Government of Ontario. The  
Government of Ontario policy regarding renewable energy projects  
such as the Sumac Ridge project includes: a streamlined approvals  
process with service guarantees for renewable energy projects while  
ensuring that high safety and environmental standards are met”.  
<http://www.energy.gov.on.ca/en/renewable-energy-facilitation-office/#.U0nH46xOUqQ>

It is requested that application EB-2013-0442 be set aside since it is not in the public interest or serves the best interest of the consumer. The Gray Road transmission line and a distribution line crossing Wild Turkey Road, components of the Sumac Ridge project, will not ensure reliability and quality of electricity services and also fails to meet high safety and environmental standards as set under government policy. Support for the request to set aside application EB-2013-0442 includes the following:

In the public interest regarding reliability and quality of electric services:

1. According to the MNR Renewable Energy Atlas, wind power in the Sumac Ridge project area is rated as being 'marginal' and will not provide consistent, reliable, quality energy production and service. Wpd Canada did not supply meteorological data to the Ministry of the Environment in the application for approval that confirms the developer's estimated annual output for the Sumac Ridge project will be 26,000MW per annum. The energy production estimate might not be accurate. Marginal rated wind resources in the project area could result in less energy output than predicted.
2. The applicant has indicated the Sumac Ridge project might supply energy to meet the needs of 1800 residential units. This project will not fulfill the needs of the nearby villages of Pontypool, Bethany and Janetville which totals 2241 households. Residents in these villages, in overwhelming numbers, have expressed their opposition to the Sumac Ridge project.
3. Approval of the Sumac Ridge REA application stipulates an underground transmission line along Gray Road. The application before the OEB is not the same as the plan approved by the Ministry of the Environment. The design has changed dramatically from the REA application to the application before the OEB. The public was not, and has not been made aware of this new plan for an aboveground transmission line. There has been no opportunity for the public or the City of Kawartha Lakes to raise potential safety and reliability issues or to examine and address any issues that might arise as a result of this new design concept.
4. Gray Road is an unmaintained trail. Year round access to the transmission line for maintenance and repairs will not be possible. Not being able to maintain the line or access it during emergency situations places the public in danger.
5. The Sumac Ridge project is under appeal to the Environmental Review Tribunal. The REA is being amended since Turbine # 1 has been identified as being too close to a 'receptor'. The configuration of the project might be changed.
6. Turbine # 2 in the Sumac Ridge project has been identified as a navigation hazard by the Peterborough Airport and the configuration of the Sumac Ridge project might change.
7. Possible changes to the Sumac Ridge project might affect the route of the transmission line; arguably the application before the OEB is premature.
8. Wpd Canada did not inform residents of the application before the OEB when originally posted. Wpd Canada did not post a public notice in the local media. Wpd Canada did not contact immediate landowners when the application was first filed. Under Treaty 20, the lands in question are under the stewardship of First Nations. There is

no evidence that the seven First Nations communities under Treaty 20 have been notified about this application.

9. Wpd issued a press release on May 22, 2013, without the knowledge of the City of Kawartha Lakes, and while the Sumac Ridge project was under review at the Ministry of the Environment. The project had not been approved. This action demonstrates disregard for the public and its representatives:

Yours truly,  
Jim Embrey

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