

From: BoardSec
Sent: April 23, 2014 10:16 AM
To: [REDACTED]
Subject: FW: COMMENTS - EB-2013-0442 FOR DETERMINATION OF LOCATION OF DISTRIBUTION FACILITIES WITHIN ROAD ALLOWANCES OWNED BY THE MUNICIPALITY OF KAWARTHA LAKES

Follow Up Flag: Follow up
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From: Ruth [REDACTED]
Sent: April-22-14 11:35 PM
To: BoardSec
Subject: 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 Street
Toronto ON M4P 1B4
Attention Board Secretary

From: Ruth Reynolds [REDACTED]
[REDACTED]

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.

This request is based on the following issues.

1) 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 safety or environmental issues that might arise as a result of this new design concept.

2) 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. Furthermore, it's current use for recreational hiking and horseback riding will add to safety concerns for those users due to industrial maintenance procedures etc. when the road does have access to vehicles!

3) The pursuit of renewable energy in a manner consistent with the policies of the Government would indicate that there should be a willing host community which clearly there is not here. The City of Kawartha Lakes and the local residents have made the message very clear that the majority of them do not want the added danger and environmental impacts that this development would bring.

4) The concept behind the government policies which are trying to bring Sumac Ridge into production is based on reducing carbon emissions while generating energy during times when the public needs it. However, meteorological data was not provided to the MOE to back up the estimates of electricity generation and there is no evidence provided that, in fact, the turbines WOULD generate more electricity than they consume, on average, during the peak consumption hours. In fact, data seems to suggest otherwise. Furthermore, the OEB should ensure that a proper electricity balance is done, subtracting the electricity used BY the turbines from the grid from the amounts that they generate, based on an hour per hour basis and not a daily average. The wind turbine companies seem to be bypassing any metering or accountability of electricity consumption for the many functions required to operate and maintain the turbines through all seasons. The OEB has a responsibility to the public to ensure that this does not happen.

Additionally, it is irresponsible for the government to proceed on the basis of reducing carbon when a carbon balance has not been published showing the carbon generated by the duplicate electricity generating system to provide power when the wind is not blowing within the range required for turbine generation. Such a carbon footprint would also include the carbon emitted during resource extraction for the turbines, contraction, transportation, erection, operation, maintenance and decommissioning, in addition to the losses in carbon sinks with tree removal and releasing carbon into the atmosphere with the subsequent processing of any removed trees. To proceed otherwise is irresponsible and is putting the public at large at risk.

5) Ontario Minister of Energy Bob Chiarelli has indicated that Ontario has a surplus of energy and will continue to have a surplus for years to come. The applicant's estimated output of 26,000 MWh per annum will place an unnecessary financial burden on consumers. Each 2.5 MW wind turbine installed today, might expect to produce at a capacity factor of 30%. The energy will be produced mostly at night and in the spring and fall when the system electricity price is lowest. The rate of \$135 per MWh for wind energy does not compare favourably with the same amount of 'green' non- CO2 emitting nuclear electricity at the nuclear base price of \$45 per MWh.

The technology is available to track and plan for electricity consumption during the peak hours. Currently electricity is being "dumped" off the grid in off-peak

hours at huge cost to taxpayers. To bring additional capacity on the system that is more likely to produce electricity during off-peak hours is, again, irresponsible.

6) Parties voicing concerns regarding and their opposition to the wpd Canada Sumac Ridge project, the first industrial wind project approved to be constructed on the supposed government-protected Oak Ridges Moraine and currently under appeal before the Environmental Review Tribunal include ...

- The Buddhist community with thousands of followers in the GTA who see a 100 million dollar long-term investment placed in jeopardy.

This also has huge economic implications to tourism to Ontario, specifically this area. This means jobloss or lack of potential employment growth.

- The Seneca Flying School that has made a huge financial investment moving to the Peterborough Airport

- The Peterborough Airport that sees a multi-million dollar expansion placed in jeopardy

- NAV Canada

- The Township of Cavan Monaghan

- The City of Kawartha Lakes

- The over 5000 people who signed petitions of opposition

- Those who submitted a record 2874 comments to the MOE when the project was posted to the EBR

- Naturalists

- Agencies and individuals working to protect The Oak Ridges Moraine

- Conservation authorities

- Scores of area residents, farmers and business owners

- Parents of schoolchildren who will be affected by the project

- The Williams Treaties First Nations comprised of seven First Nations

including the Chippewas of Beausoleil First Nation, Georgina Island First Nation, Rama First Nation, Mississaugas of Alderville First Nation, Hiawatha First Nation, Scugog First Nation and Curve Lake First Nation.

In summary, the intervenors in case EB-2013-0442 speak for the multitudes that the Sumac Ridge project, which includes the transmission line along Gray Road and a distribution line that crosses Wild Turkey Road on the Oak Ridges Moraine, is not in the public interest, that the public interest is not being served, the project will not provide reliable and quality service and does not adhere to government policy that the highest safety and environmental standards have been met. It is respectfully requested that the Ontario Energy Board set this application aside.