



association to protect AMHERST ISLAND

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Ms. Doris Dumais
Director, Environmental Approvals Access and Service Integration Branch
Ministry of the Environment
2St. Clair Avenue West, Floor 12A
Toronto, Ontario, M4V1L5

Dear Ms. Dumais:

Many thanks for your useful letter of August 28th dealing with two subjects (i) Habitat protection for avian species-at-risk, and (ii) Incomplete REA reports by Algonquin Power Inc. It is the 'incompleteness' I wish to address, again in the context of 'decommissioning', an REA requirement.

Algonquin's REA reports on 'Decommissioning' are a mixed set of contradictions by which the proponent proposes to resolve this subject. (You will have received a copy of our July 26th, 2013 letter to the CEO, Algonquin Power.) We wrote again on August 18th, with a summary of Algonquin's contradictory statements about 'decommissioning':

(i) Algonquin provided no funding for 'decommissioning' in Stantec's December 2012 REA report.

(ii) In that report, Stantec, in the 'Mode Of Disposal' of turbine components, mentions placing turbine sections in 'regulated landfills', 'recycling' (with a minor reference to Salvage), even though there appear to be no regulated landfill sites or recycling depots in Ontario which are capable of handling used turbine parts.

(iii) Sean Fairfield's letter of April 8th, 2013 says "Windlectric Inc...is responsible...for all financial issues including...decommissioning."

(iv) Algonquin's recent reply to questions on 'decommissioning' in the Municipal Consultation Form mentions none of the above, saying 'Algonquin will cover the cost of decommissioning by selling the parts for salvage'.

APAI's analysis shows the scrap value of the turbine components proposed for Amherst Island to be just \$6.3 million. The total cost of decommissioning the proposed Amherst island project is estimated at \$100 million, indicating that Algonquin would be unable to pay for decommissioning from scrap sales.

(v) On August 20th, Mr. Fairfield, in further response to APAI questions, writes: 'decommissioning will be paid for by the owner'. The 'owner' is not identified. (Algonquin is on record saying that they may sell the Amherst Island project before completion, but does not say who the buyer might be.)

Not naming 'an owner' and with a pattern of inconsistent statements saying how Algonquin would conduct 'decommissioning' clearly demonstrates that Algonquin is out of touch with the REA process. Algonquin's REA report on decommissioning is fraught with contradictions, inconsistencies and unrealizable solutions.

As such, the Algonquin REA-required report must be considered not only incomplete, but also uncompletable. We urge the Ministry to follow its own rules and reject Algonquin's REA report on 'decommissioning'.

Respectfully submitted,

Peter G.S. Large, P. Eng,

President, APAI