

DECOMMISSIONING CORRESPONDENCE

Date Letter Sent	Letter Sent To	Summary of Outgoing Letter	Response Received From Date Letter Sent
18-Mar-13	Municipal Consultation Form FILE: 2013.03.18 Municipal_Consultation_Form	Decommissioning Amherst Island is a remote site and has significant logistical constraints, which increase the cost to decommission. The Township requests financial assurances (such as security posting) that will ensure decommissioning will occur and the Township wants the proponent to commit to a timing schedule for decommissioning, i.e. to start within six (6) months of non-operation/closing and take no more than one ('1') year to complete. The proponent should be aware that at the end of the life of the project, the Township's position is that various components of wind energy system installation do not gain legal non-conforming entitlements under the Planning Act.	

08-Apr-13	<p>Loyalist Council from Sean Fairfield</p> <p>2013.04.08 Sean Fairfield to Loyalist re Response to Safety and Decommission</p>	<p>The project developer (Windlectric Inc. - subsidiary of Algonquin power Co.) is responsible (not the landowner) for all financial issues (including safety and decommissioning costs) regarding the proposed project construction and operation.</p>	
11/04/2013	<p>Premier Wynne Min. Orazietti MNR Min. Bradley ENE</p> <p>FILE: 2013.04.11 Gmail Large to Wynne Orazietti Bradley re Decommissioning</p>	<p>Algonquin's REA report on 'Decommissioning' is severely deficient.</p> <p>How will the Province finance this if the developer does not plan to pay and the Township cannot afford it?</p> <p>Neither the Province nor the developer has provided for safe recycling centres or safe landfill sites for disposal of these dangerous components.</p> <p>Wind developers' claim that decommissioning of turbines actually represents an opportunity to make money from turbine scrap is false.</p>	

16/04/2013 Sent 18-Apr-13	Doris Dumais FILE: 2013.04.16 Large to Dumais MOE summary of critiques	Summary of Critiques of the Algonquin Power Co. Windlectric REA Documents Decommissioning - omission of a financial guarantee that it will happen. Windlectric Inc. is a shell company responsible for just two or three wind energy projects. Well before the end of the contract it could be closed down or sold. The Decommissioning Report is vague in many areas:	Doris Dumais 14-May-13
19-Apr-13	Ian Parrott MOE FILE: 2013.04.20 Large to Parrott MOE re Summary of Critiques of Algonquin Power Project	Summary of Critiques of the Algonquin Power Co. Windlectric REA Documents Decommissioning - omission of a financial guarantee that it will happen. Windlectric Inc. is a shell company responsible for just two or three wind energy projects. Well before the end of the contract it could be closed down or sold. The Decommissioning Report is vague in many areas:	
20/04/2013	Sean Fairfield Algonquin Power FILE: 2013.04.20 Large to Fairfield re Decommissioning	Algonquin April 8, 2013 letter to Loyalist Council states 'Windlectric...is responsible (not the landowner) for all financial issues (including safety and decommissioning) costs regarding the proposed project construction and operation'. APAI points out gaps in these assurances. We strongly urge that Council consider insisting that Algonquin/Windlectric post a very large bond to ensure payment for the assurances your note suggests	

07-May-13	<p>Ian Robertson</p> <p>FILE: 2013.05.07 Large to Robertson re Decommissioning</p>	<p>Decommissioning</p> <p>STANTEC's Draft Report on 'Decommissioning' signed by Mr. Rob Rowland.</p> <p>Taking down a wind-turbine installation of the scale you propose for Amherst Island would unquestionably be considered an 'engineering project' and, as such, must be overseen by a professional engineer, whose stamp of responsibility and accountability must appear on the related drawings and reports.</p> <p>Algonquin has not named a professional engineer to take responsibility for this project.</p>	
-----------	--	--	--

13-May-13	Min. Bradley MOE FILE: 2013.05.13 Large to Bradley re decommissioning	Decommissioning STANTEC's report to Algonquin describes how turbine blades would be disposed. Algonquin's 'mode of disposal' is 'cut and dispose in regulated landfill'. Turbine blades typically contain epoxy resins made from Bisphenol A (BPA). BPA is known to damage human health, particularly that of children. Even a relatively small 1.5-megawatt Industrial Wind turbine blade contains about 10 tons of BPA-based polycarbon and epoxy resins. BPA is also present in the wiring insulation, high voltage insulators, circuit boards and paints on Industrial Wind turbines. Where in Ontario are the 'regulated land-fills'? Where in Ontario are the regulated facilities to cut up turbine blades? Is BPA allowed in Ontario landfills?	
-----------	---	---	--

13-Jun-13	Min. Chiarelli ENE Min. Jim Bradley MOE Min. David Orazietti, MNR Min. Linda Jeffrey, MMAH FILE: 2013.06.13 Large to Four Ministers	Several Issues, one on Decommissioning The major problem with the decommissioning report is the omission of a financial guarantee that it will happen. Windlectric Inc. is a shell company, owned by Algonquin Power, responsible for just two or three wind energy projects. Well before the end of the contract, it could be closed down or sold. A conservative estimate of the cost for the Amherst Island project is \$100M in present dollars. There is serious need for revision of sections of the Green Energy Act.	Min. Orazietti 30-July-13
19-Jun-13	Min. Bradley ENE FILE: 2013.06.19 Large to Bradley re decommissioning	Decommissioning I have not had a reply to my letter to you of May 13, 2013. Reiterates points in that letter	

12-Jul-13	<p>Doris Dumais</p> <p>FILE: 2013.07.12 Large to Dumais re Decommissioning</p>	<p>Decommissioning</p> <p>Reject Stantec's REA report on 'decommissioning'. The report is incomplete and the proposed decommissioning is uncompletable by reason of the lack of landfill and recycling facilities in the Province. The fact that 'decommissioning' (an REA requirement) as proposed cannot be completed satisfactorily is an additional, powerful reason why this project needs to be rejected.</p>	
16-Jul-13	<p>Ian Robertson</p> <p>FILE: 2013.07.16 Large to Robertson Decommissioning</p>	<p>Decommissioning</p> <p>Fairfield's letter of April 8, 2013 to Loyalist Township Council assuring the Council that 'The project developer (Windlectric Inc.)... is responsible for all financial issues (including...decommissioning costs) regarding the proposed project construction and operation'. STANTEC's incomplete report on 'Decommissioning',</p>	

26-Jul-13	<p>Ian Robertson</p> <p>FILE: 2013.07.27 Large to Robertson re Decommissioning</p>	<p>Decommissioning</p> <ul style="list-style-type: none"> -Algonquin provided no funding for 'decommissioning' in STANTEC's December 2012 REA report. -No regulated land-fills or recycling facilities appear to exist in Ontario. -Sean Fairfield's letter of April 8th , 2013 says 'Windlectric Inc...is responsible...for all financial issues including...decommissioning Algonquin's reply to questions on 'decommissioning' in the Municipal Consultation Form says 'Algonquin will cover the cost of decommissioning by selling the parts for salvage', even though 'salvage ' received just two minor mentions in STANTEC's report. 	
-----------	--	--	--

09-Aug-13	<p>Sent to Sean Fairfield</p> <p>APAI Response to Algonquin Comments on Municipal Consultation Form</p>	<p>Scrap Value of Decommissioned Wind Turbines for Windlectric Amherst Island Project</p> <p>Conclusion: The scrap value of the Windlectric project is estimated to be \$6.3M</p> <p>This is in 2013 dollars.</p>	20/08/2013
18-Aug-13	<p>Ian Robertson</p> <p>FILE: 2013.08.18 Large to Robertson re Decommissioning Scrap Value</p>	<p>Decommissioning</p> <p>Decommissioning cost has been estimated at \$100 million.</p> <p>Dr. John Harrison, physicist and APAI Vice-President, has estimated the scrap value of the turbines proposed by Algonquin. Dr. Harrison's calculation sheet is attached. Total: \$6.3 million</p> <p>Conclusion: The scrap value of the Windlectric project would be FAR below the cost of decommissioning, which reinforces the conclusion that this project would be a bad business deal.</p>	

17-Sep-13	<p>Doris Dumais</p> <p>FILE: 2013.09.17 Large to Dumais re Decommissioning</p>	<p>Decommissioning</p> <p>Algonquin's REA reports on 'Decommissioning' are a mixed set of contradictions by which the proponent proposes to resolve this subject.</p> <p>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.</p> <p>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'.</p>	
-----------	--	--	--

01-Nov-13	<p>Doris Dumais</p> <p>FILE: 2013.11.01 Large to Dumais re Top Ten Reasons Windlectric Application is Incomplete</p>	<p>Top Ten Reasons why Windlectric's REA should be rejected.</p> <p>#3 Decommissioning – No Place to Dispose of Turbines</p> <p>Windlectric submitted an incomplete Decommissioning Plan that fails to set out how turbines will be disposed of in Ontario. No Ontario regulated landfill will accept turbines with their toxic cocktail of chemicals and magnets.</p> <p>The submission fails to describe how the turbines will be transported from the Island and how decommissioning will be guaranteed by the proponent.</p>	<p>Agatha Garcia-Wright</p> <p>27-Nov-13</p>
05-Mar-14	<p>Edwards MOE from John Harrison</p> <p>FILE: 2014.03.05 Harrison re Response to the Decommissioning Plan EBR</p>	<p>Decommissioning: John Harrison Response to the decommissioning submission</p> <ul style="list-style-type: none"> -Final REA documents give no consideration to the cost of decommissioning or to the source of funding for the decommissioning. -Decommissioning Costs compared to Salvage Value of the Project -Economic Assessment of the Project 	

07-Mar-14	<p>Edwards MOE</p> <p>FILE:</p> <p>2014.03.07 Large to Edwards re Gmail EBR012 - 0774 APAI Gap Analysis Decommissioning Report</p>	<p>Decomissioning Gap Analysis</p> <p>Until such time as the issues listed above have been addressed, there is no comprehensive repair or decommissioning plan / process in place.</p>	
-----------	--	--	--

Summary of Incoming Response

No Response expected

No response expected
No Response as of 18-Feb-15

We acknowledge receipt of the summary
No Response as of 18-Feb-15
No Response as of 18-Feb-15

No Response as of 18-Feb-15

Never responded / re-vamped letter sent out 19 June 2013

The REA regulations balances environmental protection and renewable energy development: setback distances from significant habitat for wildlife, mitigation measures and monitoring. We verify that the work has been done in accordance with the REA regulation and with the criteria and procedures established or accepted by the ministry.

No Response as of 18-Feb-15

No Response as of 18-Feb-15
No Response as of 18-Feb-15

No Response as of 18-Feb-15

2013.08.20 Fairfield to APAI re draft comments on various draft technical reports

Prior to engaging in decommissioning works, the Proponent will develop a decommissioning plan in accordance with MOE requirements at the time of decommissioning. Decommissioning and restoration activities will be performed in accordance with all relevant statutes in place at the time of decommissioning. The acceptable condition for intended use will be determined at the time of preparing the final decommissioning plan.

Individual land owners will be consulted during preparation of the decommission plan and during decommissioning activities.

The costs for removal of Project infrastructure will be the responsibility of the owner of the Project.

No Response as of 18-Feb-15

No Response as of 18-Feb-15

Applicants are required to prepare a Decommissioning Plan Report that describes how the applicant proposes to restore the project location to a clean and safe condition. At minimum the DPR must describe procedures for dismantling or demolishing components of the facility, activities related to the restoration of the land and water to bring the site into a condition consistent with probable future use; and procedures for managing excess materials and waste.

No Response expected

No response expected