

June 2, 2015

VIA EMAIL & RESS

Ontario Energy Board
P.O. Box 2319
27th Floor
2300 Yonge Street
Toronto ON M4P 1E4
Email: boardsec@ontarioenergyboard.ca

Attention: Ms. K. Walli, Board Secretary

Dear Ms. Walli:

Re: Windlectric Inc. – Application for Leave to Construct Transmission Facilities (EB-2014-0300)

Updated documentation from IESO and Hydro One

We are counsel to the Association to Protect Amherst Island (“APAI”), which has been granted intervenor status in this proceedings.

We write further to the letter and enclosures filed by Windlectric Inc. (“Windlectric”) on May 29, 2015 to advise the Board that since Windlectric made its request to IESO and Hydro One for updated documentation regarding the SIA and CIA reports, Windlectric has announced further, potentially significant changes to the Amherst Island Wind Energy Project (the “Generation Project”). These changes are outlined in Windlectric’s *Modification Report #4*, dated May 2015. The changes include, but are not limited to, the fact that instead of using 21 Siemens SWT-2.3-113 2.300 MW and 15 Siemens SWT-2.3-113 2.221 MW turbines as originally planned, the Generation Project will now be using 12 Siemens SWT-3.2-113 2.942 MW and 15 Siemens 3.2-113 2.772 MW turbines.¹

In other words, Windlectric now plans on using a smaller number of higher power turbines for the Generation Project.

¹ See page 1.2. Available at: <http://amherstislandwindproject.com/REA%20Amendment%20Modification%204/REA%20-%20Amendment%20Modification%204%20Report%20Only.pdf>

The changes to the project description set out in *Modification Report #4* mean that the SIA and CIA reports before this Board are based on outdated and inaccurate information concerning, *inter alia*, the number of turbines to be used in the Generation Project and their power generation capacity.² The updated documentation provided by Windlectric is of no assistance, as it does not appear that the information in *Modification Report #4* was brought to the attention of the IESO before it issued the updated SIA Addendum Report and letter (dated May 12, 2015), nor was this information brought to Hydro One's attention before it issued its letter to Windlectric (dated May 29, 2015).

As this Board previously recognized, changes in project description may have an impact on the conclusions set out in the SIA and CIA reports.³ The agencies responsible for those reports ought to be given an opportunity to evaluate the materiality and consequences of any such changes, which the Board may then take into account in determining whether to grant leave to construct.

Accordingly, APAI submits that the IESO and Hydro One should be advised of all of the changes set out in *Modification Report #4*, and provided an opportunity to consider what impact, if any, those changes have on the conclusions set out in the SIA and CIA reports. APAI respectfully requests that any decision in this matter should await further word from IESO and Hydro on this important issue.

Yours truly,



Justin Safayeni
Encl.

c: Jonathan Myers (Torys LLP)
Maia Chase (IESO)
Laurie Kilpatrick (APAI)
Paul Le Vay (Stockwoods LLP)

² See SIA Report, Windlectric Application, Exhibit "F", Tab 1, Schedule 3 at pp 5, 11; CIA Report, Windlectric Application, Exhibit "G", Tab 1, Schedule 2 at p 3

³ See Letter from Board Secretary to the parties dated March 9, 2015