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From: [REDACTED]
Sent: March-01-16 8:55 PM
To: BoardSec
Cc: [REDACTED]
Subject: EB-2013-0339

Ms. Kirsten Walli,
Board Secretary,
Ontario energy Board

Application for Leave to Construct - wpd White Pines Wind Inc.
Board File No. EB-2013-0339

It has come to my attention, through the posting on the Board's web page, that the proponent in the above noted matter has requested an amendment to Board's Decision and Order dated March 19, 2015. As a resident, property owner and tax payer in the County of Prince Edward in the Province of Ontario, and therefore a stakeholder with an interest and voice in this matter, I would like to offer comments for the Board to consider regarding the proponent's request.

The REA issued by the MOECC for the project, and as appended to the proponent's February 19th letter, granted approval for only twenty-seven (27) turbines; not twenty-nine (29) turbines requested in the proponent's REA application. It is noted that the proponent's OEB Leave to Construct Application was also based on the power generation capacity of 29 turbines; with both of the proponent's SIA Documents and the CIA based on the power generation capacity of a 29 turbine operation. With the generating capacity of this wind farm now significantly reduced from 29 turbines to 27 turbines, the accuracy and relevancy of both the SIA Document and CIA prepared in support of the original Leave to Construct application must be called into question. Furthermore, considering the significant deviation from the 29 turbines (forming the basis of the original OEB application) to only 27 turbines, the ability of the proponent to fulfill conditions 1.(II) and 1.(III) of the Board's Decision and Order must be questioned. Given this substantial deviation from what was considered by the Board in the approval of this application, the Board should have no other recourse but to deny the proponent's request for an extension without a full and complete reconsideration of an updated application.

In addition to the above noted considerations, the Board should also be aware that while the proponent was correct in that a final decision regarding the REA appeal would be received by February 26, 2016; the decision of the REA appeal did not necessarily fully favour the proponent.

In this regard the proponent did not receive final approval of their REA and the proponent appears to be no closer today in moving forward with this project (in its 27 turbine configuration) than when they approached the Board on February 19, 2016. Given the serious concerns regarding various environmental matters which were identified by the Environmental Review Tribunal in reaching their decision in the REA appeal, it is entirely conceivable that further modifications to the proponent's proposed wind farm will be required. Such modifications could include anything; but if they include modifications such as periodic operational shutdowns; reductions in number or locations of turbines, etc., etc. the impacts of these modifications could be significant. While any further modifications necessary to satisfy the REA appeal have yet to be determined; it is not unreasonable to conclude that any further changes to the proponent's wind farm can and will alter the SIA documents and CIA that were submitted in the original application based on the envisioned 29 turbine project.

Given the uncertainty around the outcome of the REA appeal and associated environmental issues, it is respectfully suggested that the Board has only one course of action in this matter; that being to let the current Decision and Order dated March 19, 2015 stand, and if the proponent is unable to fulfill the conditions of this Order, the Board can consider a fresh application at a future date based on the final REA approved project.

Ray Ford

