
Ms. Kirsten Walli,
Board Secretary,
Ontario Energy Board

RE: Request for Extension to Leave to Construct - wpd White Pines Wind Inc.
Board File No. EB-2016-0268

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 extension and/or amendment to the Board's Vary Order, EB-2016-0046 dated March 17, 2016. As a resident, property owner, tax payer and electricity consumer 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's consideration regarding the applicant's request.

In the Board's Interim Order EB-2016-0268, dated September 20, 2016, on page 1 at lines 16 and 17, the Board notes "The OEB will not be re-hearing the merits of the original leave to construct application as that decision has already been determined." I would like to bring to the attention of the Board that the original leave to construct application, and resulting decision, was based on information substantially different from that currently being contemplated by the applicant. The applicant's approved project pursuant to the REA issued for the project consists of 27 turbines at a generating capacity of 55.35 MW; as opposed to the 29 turbines with a generating capacity of 59.5 MW per the applicant's original leave to construct application and resulting Board Order EB-2015-0339.

The Board must consider the changes to this project to be significant and a substantial deviation from the original leave to construct application for the following reasons:

- * The electrical distribution network in Prince Edward County is unreliable with frequent and significant power service interruptions. There have been, and continue to be, frequent and lengthy power interruptions in this service area.
- * The applicant's original System Impact Assessment Report (CAA ID 2010-401) was completed on October 26, 2011 and an update completed on July 21, 2014. Since the original SIA Report was completed, several large scale green energy projects (solar and wind) have been added to the integrated power system. None of these green energy additions to the integrated power system appear to have been considered or modelled in the original SIA dated October 26, 2011 or the SIA update dated July 21, 2014. Furthermore IESO have not evaluated or assessed the impacts to the power system as these new generators have been added to confirm that they have not had an impact on the reliability or quality of the electricity service and power supply grid in Prince Edward County.
- * Within the SIA Report (Addendum) dated July 21, 2014, on page 6 at lines 20 to 23 the report notes "It is very important that the WF has a proper internal design to ensure that the WTGs are not limited in their capability to produce reactive power at their maximum and minimum terminal voltages due to voltage limitations imposed by any other equipment employed within the facility." Clearly IESO are concerned about the reactive power capability of the applicant's facility; therefore any changes to the applicant's original proposal must be carefully examined.
- * Within the SIA Report (Addendum) dated July 21, 2014, on page 6 at lines 29 to 31 the report notes "Simulation results show that under this situation the wind farm will inject about 13.3 MV Ar reactive power at the connection point, which may aggravate a high-voltage situation under some system conditions." Clearly IESO are concerned about the power system and have further concerns about potential impacts that the applicant's wind farm could exert on the integrated power system. The deletion of the two turbines and associated circuits and collector lines will impact impedance calculations and other parameters evaluated and considered by IESO in their review of the original application. It stands

to reason that an updated set of parameters recognizing the current state of the applicant's wind farm should be evaluated by IESO to ensure there are no foreseeable impacts to the local integrated power system.

* On page 3 in the Board's Decision and Order EB-2015-0339 dated March 19, 2015 in this matter, the Board recognized that it is bound by the provisions of section 96 of the Act; including section 96.(2) 1. which obligates the Board to consider "The interests of consumers with respect to the prices and the reliability and quality of electricity service.". Clearly the Board has an obligation to consider the interests to consumers as it relates to the reliability of electricity resulting from any changes to the underlying original OEB application; regardless of whether those changes are imposed by the REA or offered voluntarily by the applicant; and regardless of whether the changes appear significant or not.

In consideration of the above noted concerns and the Board's September 20, 2016 Interim Order wherein the Board notes that the OEB will not be re-hearing the merits of the original leave to construct application, it is respectfully suggested that the current REA approved 27 turbine application is not the same as the original application, so any hearing conducted by the Board would not be a re-hearing of the original leave to construct application; but a fresh hearing on a new application. Therefore it is respectfully suggested that the Board consider a hearing in this matter.

Should the board not be prepared to conduct a hearing on this application at this time then it is respectfully suggested that the Board has only one course of action in this matter; that being let the current Decision and Order stand and if the applicant is unable to fulfill the conditions of that Decision and Order within the time extension granted by the Board pursuant to Interim Order EB-2016-0268, then the Board can consider a fresh application from the applicant at a future date based on an updated SIA report prepared for the final REA approved project.

Please note that I have copied the Honourable Minister of Energy so that he is aware of my concerns regarding the reliability and quality of electrical service as it relates to the subject project. I would appreciate receiving an acknowledgement of receipt of this message from the OEB.

Thank you for your anticipated consideration of my comments.

Ray Ford
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