ERO#013-3800

Thank you for the opportunity to give input into this amendment. The input that I am giving is solely as an individual and represents my personal viewpoint only.

Please accept the following items in this regard:

1. Municipalities must be free to establish their own impact and demand assessments and use this information, alongside other existing tools, to make their own decisions for new and existing large renewable energy projects, with the ability to negotiate additional standards with the proponent, beyond those laid out in provincial and federal regulations
2. Ontario’s baseload generation system is already largely free of carbon emissions and well below its maximum output capacity, therefore large-scale private renewable generation, especially those that are preconstruction (foundation not yet complete), must be deferred until the added capacity is actually required. However small scale homeowner or community energy independence should be encouraged.
3. The requirement to demonstrate demand should also apply to both increases in rated capacity and any extensions beyond the initial term
4. Any wind turbine projects grandfathered under outdated noise models must demonstrate demand for all capacity in order to be extended beyond the initial term and if granted
5. Repowering of wind turbines must automatically invoke most current noise regulations regardless of new or existing capacity
6. A review of demand should be triggered by changes of ownership with focus on the percentage of capacity in a region and province-wide under the control of a single non-government owner
7. Reviews of demand must include analysis by time of day and by peak hour(s) in order to accurately assess production at true time of need to avoid averaging across the day
8. Reviews of demand must include analysis of the use of supplemental carbon based power generation used to smooth out valleys created by the use of wind energy and solar energy whose output are highly variable due to its dependence on weather conditions
9. Reviews of demand must include analysis of the ‘quality’ of power generation and its affect to key end users. Some corporate users, who are the heaviest users of electricity, have found that since the introduction of weather dependent power generation the variability in electrical power created by renewable energy generation has effectively made provincial power unusable for their business. This has caused them to introduce carbon based power generation to power their business, effectively negating any potential positive environmental effect of wind and solar power generation in that area.
10. Renewable energy contracts should preferentially target existing and stable energy sources, with an eye to find new, innovative and non-invasive ways to leverage pre-existing source materials. By way of example: Capturing methane or other by-products resulting from dump facilities
11. Ownership change s/b regulated in the electricity industry so that no single proponent can own

more than 7% of total capacity in a region and hold Ontario hostage or at risk from their failure.

1. The wind industry is the only energy industry not licensed and closely regulated in operation. Licenses should be established to recover approval, oversight, monitoring, administrative and complaint processing costs from those receiving the business benefit. It should not be borne by taxpayers nor Ontario Hydro ratepayers.
2. Need for electricity should proportionally consider the desires of local rate payers. For example in areas where the need for electricity is low or very low, the percentage of ratepayers supporting a renewable energy project must be high or very high to allow the project to proceed.
3. Given that there is always some degree of risk to the local environment for any renewable energy project, the need for electricity should proportionally consider the potential risks to the environment. For example in areas where the need for electricity is low or very low, the proponent should be required to more conclusively prove that potential risks to the environment, above or below grade (including water, aquifers, soil types and geological fault lines), are extremely low or negligible.
4. Need for electricity must permit the municipality to include additional factors into the analysis, and into the decision making process, that will result as a by-product of the energy project. Items such as the effect on local land value, attraction of new residents, effects on local business, etc. In other words, to what degree do we NEED electricity if it is going to result in negative impacts to other rate payers or the municipality as a whole. These factors and the resulting analysis can be used to negotiate additional conditions on a renewable energy project.
5. Renewable energy project contracts should reserve the province’s right to reduce or increase amount of electricity they will purchase from the owner with 90 days notice.
6. Any wind turbine or solar installation that is not producing 75% or more of its expected output (based on past performance and current weather conditions) must be repaired or demolished within 90 days of notice. Demolition will be allowed up to 12 months to complete and must include at least all parts of the structure above grade.