

WCO | WIND CONCERNS ONTARIO

June 20, 2022

IESO Engagement

Re: Long-Term RFP

We have several comments following the engagement session held on June 9th, regarding the new initiatives to procure additional capacity for the Ontario electrical system

While the presentation circulated prior to the meeting was not clear whether proposals for grid-scale wind power will be accepted in this new initiative, the responses to two separate questions during the session clarified that the turbine projects cannot meet the requirements to provide four hours of dispatchable power. They would have to participate in conjunction with some form of storage capability. We see this as an important step forward where the IESO procurement process focuses on the actual needs of the grid rather than following ideological dreams of groups pushing wind turbines as the solution to Ontario's electrical needs. Electricity users in Ontario are still living with the problems created when the government gave direction to the IESO to pursue wind and solar power despite the needs of the electrical system.

We are concerned with the comment that there may be a role for wind turbines in future procurements that are focused on supply, rather than capacity. In the context of this potential for expanding wind power capacity in the future, we provide the following comments for the IESO to consider:

The first of course is that Ontario has already learned a hard lesson via grid-scale wind power. In Ontario, power is generated from wind out of phase with demand, and as a weather-dependent source of power, does not provide the reliability that energy minister Todd Smith has stated is critical to Ontario, going forward.

It is also not affordable, another of the minister's watchwords. Two Auditors General asked that cost-benefit analyses be done for wind power proposals. This was never done by any administration in Ontario which opened the doors to wind power; instead, wind power developers were given highly favourable contracts that committed the IESO to purchase their output whether or not it was required. Estimates are that Ontario citizens have spent more than \$35 billion for a power supply that is intermittent. Ontario frequently sells surplus wind power at a loss on the electricity market, losing as much as millions in a single day. That cannot be repeated. Future contracts must be based on purchasing generation only when it is required by the market.

Without the subsidies provided by the favourable terms provided in the current contracts, it is not clear that grid-scale wind power can be supported as a source of reliable, affordable power that will assist

Ontario in achieving any climate action goals, or to foster a stable power supply to support business, and electrification for municipalities and citizens.

There is also the issue of the lived experience with Ontario's existing fleet of wind turbines. At the moment, the Ministry of Environment, Conservation and Parks (MECP) holds records of formal Pollution Incident Reports for citizen complaints of noise and other problems associated with wind turbine operation. Our count, as a result of Freedom of Information requests dating from 2006 to the end of 2018 (other requests are outstanding) show that there are as many as 7,000 such formal records for that time period. Despite requirements in the Renewable Energy Approvals for these projects that require that steps be taken to address complaints from local residents, there is virtually no evidence that these complaints have been addressed.

Wind turbine noise is regulated by the ministry, and wind power operators must fulfill certain conditions of their Renewable Energy Approvals (REAs) including acoustics audits to verify compliance with regulations.

The shocking truth is that in Ontario as of February of this year, public documents show that only 43 percent of operating wind power projects have audits that are completed and accepted by the MECP. Put another way, that means that **more than half of Ontario's operating wind power facilities have failed to demonstrate compliance with regulations.** (See Appendix.)

The process to qualify bidders for new contracts should consider the developer or operators performance with approval terms should be added as an important consideration in when deciding which operators will be qualified to bid on future projects. In our view, no developer or operator should be allowed to propose any sort of new project or expansion, while the operator has not complied with the terms of the approvals for existing projects. The IESO comments that proponents must be in "good standing" if they have existing contracts with the IESO. In our view, failure to meet basic requirements such as mandated noise audits would mean a proponent is **not in good standing.**

It's not all about noise: citizens appealed the approval of a project in North Kent over environmental concerns about a fragile and vulnerable aquifer. Now, years later, an expert review panel commissioned by the Ministry of Health looking at the complaints of people whose water wells have ceased to function or provide potable water concluded that yes, there is a problem, and yes, there is a connection to the construction and operation of the nearby wind turbines.

As a coalition of local community groups, WCO has also observed the implementation of some requirements used in previous procurement processes that are being carried forward in this new initiative.

It is difficult for a community, municipality or Indigenous community to feel heard and their input considered when the RFP requirements do not include the need for a proponent to engage/ openly discuss options and achieve agreement before a contract is executed. This promotes the feeling of us vs them or rural vs urban. Rural communities, municipalities and Indigenous communities will not have a real say before a contract is offered/executed.

Proponents do not take the public meeting requirement seriously. Generally it has been treated as a box to be ticked. Frequently, the details provided to the community on the project were limited as it had not been finalized, experts with no credentials in the field being addressed were recruited to provide "evidence" while valid input from local community experts was ignored. The people conducting the meetings were generally not familiar with the community and were unaware of important information relative to the appropriateness of the project. If the IESO is proposing to continue the requirement for public meetings, then it needs to develop standards and/or an independent process to ensure that this form of public engagement is meaningful and that the results of public consultation are reflected in the final proposal.

Similarly, previous procurements point to problems with the Indigenous Participation process proposed for the procurement. In at least two projects in the previous LRP effort, local Indigenous communities opposed a project that qualified for bonus point based on investment from an Indigenous community in another part of the province. The requirement to advise the local community will not address the divergent views within Indigenous communities on how the natural environment should be exploited. Indigenous support should be limited to the local community.

The question the amounts to be used to calculate the degree of Indigenous participation reflected an issue that has also been observed in local projects. The solution would appear to be relatively straightforward – the participation rate should be based on the total capital cost of the project with no value being provided for future service provisions. The rejection of adding a price adder for Indigenous participation was also appropriate.

The requirements for municipal consultation do not appear to reflect changes introduced by the government in 2019. In particular, municipal zoning by-laws once again apply to renewable energy projects. Similarly, the discussion of changes to same technology upgrades should reflect the changes that the government made to Regulation 359/09 on this issue.

We also note the divergence in direction between the City of Ottawa's "Energy Evolution" plan and the direction being set out by the IESO. Beyond the focus on predominately wind and solar as the solution to Ottawa's energy requirements, the Ottawa Renewable Energy Cooperative is pursuing members in Huron, Bruce, Grey, Perth, Middlesex, Lambton and Wellington Counties to invest in renewable energy projects. We note that none of these areas are in the areas that the IESO has identified as needing new production capacity.

Ontario has been a model for the world in de-carbonizing its power supply and by providing citizens with a largely emissions-free, reliable, and affordable power system.

The IESO should work to enrich that legacy by declining to accept proposals for further wind power development in light of unresolved and serious problems.

Thank you.

Jane Wilson

President

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Wind Concerns Ontario is a non-profit, incorporated coalition of community groups, individuals and families concerned about the effect of industrial-scale or grid-scale wind turbines on the economy, the environment, and on human health.

Status of Ontario Wind Turbine Noise Compliance Audits

This table is based on information originally released in August 2019 by the MECP in response to a Freedom of Information request. It has been updated with information on more recent compliance testing from project websites. As the Protocol requires that project operators post these audit reports on their websites within 10 business days of their submission to the MECP, this should be an accurate source of status information.

	Project Name	Commercial Operation Date ¹	I-Audit Submitted to MECP ²	Updates to February 1, 2022 ³	MECP Review Completed ⁴	Time Since Start of Operation ⁵
	Demonstrated Compliance	Share – 43% - Average time under review – 3.8 years				
1.	Adelaide (Suncor) Wind	January 28, 2015	October 29, 2015		March 9, 2020	5.1 years
2.	Armow Wind Project	December 7, 2015	February 24, 2017		November 6, 2020	4.8 years
3.	Belle River Wind	September 1, 2017	August 6, 2020		August 20, 2020	2.6 years
4.	Bluewater Wind	July 19, 2014	June 12, 2015		June 25, 2019	4.9 years
5.	Bow Lake	August 10, 2015	August 9, 2017		March 21, 2019	3.6 years
6.	Dufferin Wind	December 1, 2014	September 1, 2015		September 26, 2018	3.8 years
7.	East Lake St Clair	May 22, 2013	April 20, 2016 ⁶		April 20, 2016	2.9 years
8.	Ernestown Wind	September 30, 2014	June 29, 2015		April 30, 2018	3.6 years
9.	Grand Bend Wind	April 19, 2016	March 21, 2017		December 4, 2018	2.6 years
10.	Grand Renewable Energy	December 9, 2014	December 21, 2015		November 4, 2019	4.9 years
11.	HAF Wind	June 14, 2014	March 14, 2015		December 17, 2018	4.5 years
12.	Grey Highland Clean Energy	September 21, 2016	July 11, 2017		August 30, 2019	2.9 years
13.	Grey Highlands ZEP	February 26, 2016	July 31, 2018		August 30, 2019	3.6 years
14.	MacLean's Mountain Wind	May 1, 2014	February 27, 2015		March 20, 2019	4.9 years
15.	Moorefield Wind	May 16, 2017	December 17, 2018		March 25, 2019	1.9 years
16.	Oxley Wind	February 8, 2014	September 27, 2017		April 25, 2019	5.2 years
17.	Napier Wind	December 3, 2015	March 3, 2017		January 22, 2021	5.1 years
18.	Quixote One	August 14, 2015	September 1, 2017		April 15, 2019	3.7 years
19.	St Columban Wind	July 16, 2015	June 22, 2016		October 2, 2018	3.2 years
20.	Settler's Landing	April 5, 2017	August 22, 2018		May 10, 2019 ⁷	2.1 years

	Demonstrated Non-Compliance- REA Amended	Share – 2%				
1.	North Kent 1 Wind	February 22, 2018	June 30, 2019	November 1, 2021	November 1, 2021 ⁸	3.7 years

	Demonstrated Non-Compliance – No Resolution	Share – 7% - Average time under review - 6.8 years				
1.	K2 Wind ⁹	May 29, 2015	November 25, 2016	December 12, 2019		6.8 years
2.	Unifor/CAW ¹⁰	October 24, 2013	June 28, 2018	No Updates	Not Provided	8.3 years
3.	Niagara Region Wind	November 2, 2016	July 20, 2018	February 3, 2021		5.3 years

	Deemed Incomplete	Share - 17% - Average time under review – 7.1 years				
1.	Cedar Point Wind	October 7, 2015	September 21, 2016	June 24, 2019		6.3 years
2.	East Durham Wind	August 15, 2015	August 17, 2016	July 2, 2019		6.5 years
3.	Goshen Wind	January 28, 2015	January 28, 2016	November 7, 2017		7.1 years
4.	Grand Valley Wind Phase 3	December 3, 2015	November 30, 2016	March 1, 2021		6.2 years
5.	Pt. Dover/Nanticoke Wind	November 8, 2013	August 6, 2014	December 16, 2020		8.3 years
6.	South Branch Wind	March 4, 2014	May 28, 2015	March 3, 2016		7.9 years
7.	Springwood Wind	November 21, 2014	May 31, 2016	No Updates ¹¹		7.2 years
8.	Whittington Wind	November 21, 2014	April 1, 2016	No Updates ¹¹		7.2 years

	Under Review	Share – 30% - Average time under review – 6.0 years				
1.	Adelaide (NextEra) Wind	August 22, 2014	August 10, 2015	June 26, 2020		7.3 years
2.	Amherst Island Wind	June 15, 2018	June 14, 2019	May 14, 2020		3.6 years
3.	Bornish Wind	August 15, 2014	August 7, 2015	July 2, 2020		7.3 years
4.	Conestogo Wind	December 20, 2012	December 20, 2013	April 5, 2019		9.1 years
5.	Gunn’s Hill Wind	November 14, 2016	October 16, 2018	No Information		5.1 years
6.	Port Ryerse Wind	December 9, 2016	July 17, 2018	No Updates		5.1 years
7.	Romney Wind	December 31, 2019	Not Yet Due	June 29, 2021		1.8 year
8.	Snowy Ridge	October 5, 2016	September 20, 2017	No Updates ¹¹		5.3 years
9.	South Kent Wind	March 28, 2014	January 30, 2015	August 14, 2020		7.9 years
10.	Sumac Ridge Wind	November 17, 2017	September 27, 2018	No Information		4.1 years
11.	Summerhaven Wind	August 6, 2013	February 10, 2014	May 1, 2020		8.5 years
12.	Underwood ¹²	February 9, 2009	Not Provided	No Updates		13.0 years

13.	Wainfleet Wind	September 17, 2014	May 15, 2015	No Information		6.4 years
14.	ZEP Ganaraska Wind	May 6, 2016	September 14, 2018	No Information		4.7 years

	Submission Due					
1.	Henvey Inlet	October 19, 2019	Due – October 2020	No Information		2.3 years

	Not Yet Due					
1.	Nation Rise	June 17,2021	June 14, 2022			0.6 years

¹ IESO Active Contract List as at September 30, 2021

² Data Provided by MECP as at July 30, 2019

³ Based on a review of project websites – “No Updates” = No change in information; “No information” = audit no information posted on website

⁴ Dates provided by MECP.

⁵ Elapsed time calculated either to the date compliance was confirmed or to the current date.

⁶ Identical dates for submission and review completion provided by MECP

⁷ Approval date posted by operator conflicts with status provided by MECP 2 months after “approval”

⁸ REA amended to reduce night time noise levels at 2 wind turbines to bring noise levels within noise guidelines.

⁹ In May 2019, the Ministry found the K2 project was out of compliance and ordered the operator to develop and implement a Noise Abatement Action Plan.

¹⁰ Turbine determined to be non-compliant on March 8, 2018, Noise Abatement Action Plan implemented. Problem not resolved.

¹¹ Capstone Renewable Project, limited project documentation posted on project websites.

¹² I-Audit report submitted in January 30, 2018 accepted and then rejected by MECP. More noise testing is currently underway.