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30 July 2013

To: Ontario Power Authority (OPA)  
Independent Electricity System Operator (IESO)

Email: [Sylvia.Kovesfalvi@powerauthority.on.ca](mailto:Sylvia.Kovesfalvi@powerauthority.on.ca)

Dear Sirs:

**Re: Ontario Dialogue on Regional Planning and Siting of Large Energy Infrastructure**

Ontario Rivers Alliance (ORA) is a Not-for-Profit grassroots organization acting as a province-wide voice representing several groups, including the French River Delta Association, Council of Canadians, Friends of Temagami, Whitewater Ontario, Vermilion River Stewardship, Mississippi Riverwatchers, French River Stewardship, along with many other stewardships, associations, and private and First Nations citizens who have come together to protect, conserve and restore healthy river ecosystems all across Ontario.

Further to my conversation with Sylvia Kovesfalvi, ORA is making a late submission in response to your request for input into how regional electricity planning and siting of large energy infrastructure should be handled in Ontario. Somehow we missed this important call for input, and we apologize, but we are requesting that you include our suggestions in your final report to the Minister of Energy.

## **I. REGIONAL ELECTRICITY PLANNING**

### **1. Current Process:**

To date, all public consultation efforts have been designed to inform the public after a FIT Contract has been issued and an Environmental Assessment has commenced - not to provide meaningful input into the project, or even whether the project is acceptable to the community. This has resulted in much opposition and anger from the public, First Nations, municipalities and stakeholders.

### **2. Suggested Improvements:**

ORA recommends the following:

- a. The highest priority is offered to municipalities, First Nation communities, the public, and stakeholders to provide meaningful input and participation at the very earliest stage of energy planning – long before any contract or approvals have been issued.
- b. The California example where public participation takes place through a workshop environment with a “rolled up sleeves” examination and discussion of the issues seems very workable and appropriate.
- c. Afford an opportunity to appeal or argue the importance and/or effect before and after a proposed decision.
- d. Assessment for siting must be based on a watershed approach, taking into account all existing uses, environmental and ecological pressures, and cumulative effects of any new project on a community, stakeholder, river, endangered species, and habitat.
- e. To be totally transparent, inclusive and open, the public could be kept informed through a registry website where:
  - i. All new Regional Energy Plans, or those up for review, are posted, along with details and status of the plan.
  - ii. Any interested parties could register to receive notice of updates concerning regional and municipal energy plans.
  - iii. The public could access and download all documentation and correspondence concerning energy plans.
- f. All meetings and documents are open to the public, First Nations, municipalities and stakeholders.
- g. Intervener’s fees are provided to members of the public, groups and agencies, who are approved through a formal application process.
- h. Maximize the time available to the public for input at the very beginning of the siting process.
- i. A guide is prepared to inform how the public can maximize opportunities for effective participation, and protect substantive rights.
- j. Communities/municipalities (not just a few local investors calling themselves part of a community) could be offered priority incentives, low interest loans, limited or 50/50 grant funding; however, projects should be sustainable and able to stand on their own economic legs without public support.

## II. SITING OF LARGE ENERGY INFRASTRUCTURE

### 1. Current Process:

The current siting process created a gold-rush approach where one waterpower developer made site application for thirty three proposals. This process has worked well for proponents, but the public and municipalities have been left totally out of the decision making loop.

At present, a FIT Contract is offered to proponents long before any public knowledge, involvement or consultation has taken place, and once a contract is issued there is no possibility of a no outcome.

### 2. Suggested Improvements:

- a. It is vitally important that municipalities, First Nations, the public and stakeholders are provided input into the type of renewable energy projects preferred in their community, and where they would best be sited.

- b. ORA would prefer a Siting Board made up of representatives from the municipality, community, First Nations, and other stakeholders to be given the task of reviewing and recommending specific generation sites.
- c. Require all large generation go through an individual Environmental Assessment which addresses alternative solutions to meet the need.
- d. Require an Individual EA for all waterpower generation projects that create headponds.
- e. The local community having to live with the project should take precedence and have the final say over any Regional Electricity Planning decision.

**3. Pros and Cons:**

These suggestions create the foundation of a democratic process, and may take more time and dollars in the short-term, but in the long-term the benefits are great:

- a. Those having to live with the renewable energy projects will have been part of the decision making process from the beginning and will at least feel they have been heard and considered;
- b. Increased assurance on the part of proponents that once sited, approvals and permitting would proceed much more quickly without as much opposition; and
- c. Renewable energy projects will be embraced by the community.

ORA is grateful for this important opportunity to provide input. Please include ORA in all future electricity planning and review initiatives.

Respectfully,



Linda Heron  
Chair, Ontario Rivers Alliance