



379 Ronka Road  
Worthington, ON  
P0M 3H0  
(705) 866-1677

[LindaH@OntarioRiversAlliance.ca](mailto:LindaH@OntarioRiversAlliance.ca)  
[OntarioRiversAlliance.ca](http://OntarioRiversAlliance.ca)

---

21 August 2013

Ontario Power Authority  
Email: [LRP@powerauthority.on.ca](mailto:LRP@powerauthority.on.ca)

Dear Sirs:

**Re: Feedback on the Large Renewable Competitive Procurement Process**

Ontario Rivers Alliance (ORA) is a Not-for-Profit grassroots organization acting as a voice for the French River Delta Association, CPAWS-OV, Council of Canadians, Kiishik Community Association, Food & Water First, Whitewater Ontario, Vermilion River Stewardship, Mississippi Riverwatchers, French River Stewardship, as well as 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.

In this submission ORA makes numerous reference to waterpower as this technology obviously has the most direct impact on Ontario river ecosystems, and are of major concern. However, many of our recommendations can also be applied broadly to other renewable energy technologies. I also took part in the OPA Webinar on the 7<sup>th</sup> of August, so some recommendations may be repeated in this submission.

In response to your "Discussion Questions", ORA has the following recommendations:

1. Are Expression of Interest/Request For Proposal processes still appropriate selection methods for new competitive procurement processes?

**ORA Recommendations:**

- a. Community, Co-op and First Nation proposals should take preference over private corporations or lower bids in any procurement process, as well as in access to the grid.
- b. Ontario Power Generation is publicly owned and should be given priority over private corporations.
- c. The current process, or a reverse auction process, is acceptable as long as it is a transparent, open, and fair process. All bids, proposals and decisions should be fully open and available to the public through OPA's website.

2. Are there aspects of the FIT Program that should be included in the new competitive process? Are there aspects that should not?

**ORA Recommendations:**

- a. A FIT Map should be made available for download on OPA's website showing all

- energy Contracts listed by category (hydro, wind, solar, etc.).
- b. FIT Contracts should not include:
    - Payment for all power generated whether it is required or not.
    - Peaking bonuses that encourage developers to maximize power generation at the expense of the environment.
  - b. There must be a limit to how many contracts any one developer is allowed – this would avoid domination of the market, or taking on more than they can responsibly handle.
  - c. Hydroelectric using headponds or peaking strategies must not be included in the FIT Program – see 4(a).
3. One typical evaluation criteria is price/cost. Are there other measurable criteria that should be considered?

**ORA Recommendations for measurable criteria:**

- a. Municipal, First Nation, community or co-op involvement should take priority.
  - b. Municipal zoning, site plan approval and a Motion by Town/City Council in support of project.
  - c. Proponent experience, track record, economic viability/sustainability of project, and sufficient financial resources.
  - d. The project must truly be green and environmentally sustainable to be included under green energy procurement.
4. Should the new procurement differentiate on criteria such as project size, technology, etc.? If so, why?

**ORA Recommendations:**

- a. Waterpower using headponds or peaking strategies should not be included in any green energy program, as this type of generation results in dirty energy where there are numerous and well-studied negative impacts to water quality, water quantity, and fisheries; and the methylmercury produced from newly inundated land risks contaminating fish, an important food source, and poses a significant threat to public health and safety.
  - b. Peaking bonuses should not be paid to waterpower developers under any circumstances, as it only encourages them to maximize power generation at the expense of the environment.
  - c. The more environmental impacts – the greater the criteria should be.
5. What community engagement should be required prior to project evaluation? How should engagement be measured?

**ORA Recommendations:**

- a. A number one priority is the need to consult with the public, First Nations, and municipalities before the procurement process begins or a Contract is issued. Local communities must be allowed to decide the type and appropriate locations for renewable energy projects. Those having to live with the consequences of a project must have the final say for what is acceptable or suitable for their community. For instance, waterpower may not be an option if the freshwater in a community is already heavily compromised from mining, waste water treatment facilities, or is already dealing with heavily contaminated river sediment or toxic algae.

- b.** Consultation should entail:
    1. A notice of a public meeting should be posted in the local newspapers, and any known environmental and stakeholder groups notified directly;
    2. A public consultation meeting;
    3. Deputation in front of municipality; and
    4. A formal motion from the municipality to accept or reject a proposal.
6. What criteria or requirements could help identify appropriate project locations and siting requirements?

**ORA Recommendations:**

- a. Municipalities should determine appropriate projects and sites for their community through a formal Motion passed by Council. OPA should not have the final say.
  - b. Each municipality could be required to develop a Renewable Energy and Conservation Plan for their municipality.
  - c. Municipal, co-op, or community involvement and agreement should take priority.
  - d. Cumulative effects must be considered on a watershed basis when considering a waterpower project, so all other pressures on a river ecosystem must be taken into account before a contract is issued.
7. Building on other recent engagements, is there any new input that the OPA should consider?
  - a. All renewable energy projects should require decommissioning provisions up-front.
  - b. Energy storage technology should be encouraged through research and development incentives.
  - c. When communicating the Installed Capacity of a project, the actual power estimated to be generated must also be stated. It is very deceiving when the public is given Installed Capacity when the actual power generated will usually be less than half on renewable energy projects.
  - d. Ensure existing waterpower generation has been upgraded and efficiencies made **before** new generation is contracted.
  - e. All waterpower projects should be required to complete a financial feasibility study to ensure environmental sustainability is assured as a result of the economic limitations or sustainability of the project. The environment and public health and safety must come before profits.
  - f. To be fully transparent and open, all applications and contracts must be listed on OPA's website, along with developer, size, type, location, key details, and current status of the project.

ORA is very grateful for this opportunity to provide input on the large renewable energy competitive procurement process. Please consider ORA as a registered stakeholder in all future policy review processes.

Respectfully,



Linda Heron  
Chair, Ontario Rivers Alliance