

WCO | WIND CONCERNS ONTARIO

May 13, 2022

Mr. Lesley Gallinger

President and CEO

Independent Electricity System Operator/IESO

By email

Re: wind power generation in Ontario

Dear Mr. Gallinger:

As you will know from being copied on his recent letter to me, Ontario Minister of Energy Mr. Todd Smith advised us to contact you with regard to the current procurement of new electricity resources in Ontario. (Letter April 11, 2022)

We have been following the process and reviewing comments made by other stakeholders, and believe we should add our comments to the process as well.

Our main concern is, obviously, power generation from wind energy. Since Ontario began using wind turbines in 2006, accelerated by the passage of the *Green Energy and Green Economy Act* in 2009, the province has gone through a range of experiences, from welcoming this energy technology to our present state of evaluating whether in fact it really works for us.

In ten words or less, wind power is associated with a number of significant negative effects. What we have seen in the Ontario experience is:

- A significant rise in electricity bills due to above-market long-term contracts that also contained “must-take” clauses. Two Auditors General stated that Ontarians have overpaid for wind power by billions.
- Other negative economic impacts such as lost property values, alteration of community character, landscapes etc. Again, Ontario Auditors General have noted that there has never been a cost-benefit analysis done for wind power generally, or for any individual wind power project.
- The Ontario environment ministry now possesses thousands of formal Incident Reports recording complaints about noise, vibration, sleep disturbance and other health impacts or Adverse Health Effects, disturbance of water wells, and more. We have records of approximately 7,000 such documents, only to the end of 2018 (that Freedom of Information

request was not fulfilled properly and is being redone; other requests for records for 2019, 2020 and 2021 have not been fulfilled)—there are doubtless many thousands more.

- Environmental impacts associated with wind turbines or wind power generators such as harm to wildlife, including migratory birds and at-risk or endangered species of wildlife such as bats. Both are crucial to the eco-system; any harm that comes to wildlife has wide-ranging environmental and economic repercussions.

In short, wind power has a high impact on the environment for little benefit. Wind power is a low-density source of power, because it requires a great deal of land, often prime-agricultural land. Already university researchers caution that a significant amount of Ontario's prime agricultural land has been lost to wind power infrastructure.

The wind turbines, and associated transformer substations, transmission lines and cables, and access roads represent a conflict in land use. What happens when the wind turbines arrive is that a community is essentially industrialized.

And for what? Wind power is an intermittent, weather-dependent source of power that can never be baseload power. Put simply, wind power cannot do what its lobbyists say it will: replace fossil fuel power generation, or be a reliable partner to nuclear and hydro. Grid-scale storage is at least a decade away, if it is feasible at all.

What we would ask of the IESO in proceeding with this new RFP process, assuming that there will be some proposals for new wind power generation, is that criteria for acceptance include a cost-benefit analysis for every project. Frankly wind power has "skated" on its "green" reputation for years: it needs to prove that, if Ontario's goal of reliable and affordable energy is to be realized. The fact is, the inputs to the construction of wind turbine components and the wind power facilities themselves are a grave challenge to claims of being "green"—the industry has also not resolved the fact that components such as the carbon fibre blades and the nacelle equipment are not recyclable. At end of life these components head for the landfill. This is an issue for Ontario's clean energy certification program as well. Wind power needs careful evaluation of its claims to be "clean" energy.

We would also ask that there be metrics for community acceptance. We have too many municipalities in which there is an urban-rural divide, and rural residents—who are the ones who have to live near or inside wind power projects—are outvoted in council meetings or referenda. This is not equitable. (For example, City of Ottawa staff have written to the IESO stating that they want more wind power resources and suggest the city has "vast rural areas" ripe for exploitation...as if no one lives there.)

We laud the current government for returning land use planning powers for renewable energy projects to municipalities, but municipal approval may or may not be truly representative of the level of support from the rural residents who would be most affected.

We must also note that enforcement of Ontario's existing regulations for setbacks and noise limits for wind turbines has been lax. At present, only 43 percent of Ontario's operating wind power projects have verified compliance via acoustic audits as required by their Renewable Energy Approvals. Some audits

have been in review for years—as long as NINE YEARS. This is not acceptable and does not provide assurance of protection of health and safety for individuals or communities. The fact these projects have not been able to verify compliance with mandated regulations and the conditions of their Renewable Energy Approvals means they are also in breach of the conditions of their contracts with the IESO. No extensions or amendments of these contracts should be entertained until compliance can be verified.

And speaking of regulations, the Government of Ontario has not revised its regulations for setbacks and noise limits since 2009. Not only the Ontario experience but that of other jurisdictions around the world indicate it is past time for a review. Wind Concerns Ontario recently recommended a 2-kilometre setback between wind turbines and homes, based on our review of other jurisdictions. Ontario's setback regulation is currently an inadequate 550 metres.

If “repowering” of existing wind power projects is to be considered in this procurement effort, it must be noted that at present, no notification to municipalities is required and neither is any new environmental assessment, despite the fact that wind turbines were 1 megawatt or less years ago, and the newest ones put into operation exceed 3 megawatts.

There are many things to consider as regards grid-scale wind power.

We are grateful for the detailed and thoughtful engagement process being enacted for this RFQ and RFP, and hope that our comments will be included.

Sincerely,

Jane Wilson

President

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