



**ONTARIO  
RIVERS  
ALLIANCE**

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

Dear Sirs:

**Re: Feedback on the Large Renewable Procurement - Request for Proposals  
LRP | RFP Framework**

Ontario Rivers Alliance (ORA) is a Not-for-Profit grassroots organization with a focus on healthy river ecosystems all across Ontario. ORA is a voice for a number of member and partner organizations, stewardships, and associations, as well as many other private and First Nations citizens. We have come together to protect, conserve and restore healthy river ecosystems, and to ensure that development affecting Ontario rivers is environmentally and socially sustainable and responsible.

ORA is very pleased to comment on Ontario Power Authority's (OPA) LRP | RFP Framework. ORA is primarily concerned with waterpower procurement and its high potential to impact on water quality, water quantity, and on riverine ecosystems.

ORA commends OPA for its decision to base its LRP contract decisions on the best value for Ontario ratepayers. We are also pleased that information will be posted centrally on the OPA's LRP website as a resource for the public.

We offer our comments as follows:

**1. Priority to Provincial/Public/Municipal Corporations**

ORA is requesting that priority and preference be provided to Ontario Power Generation (OPG), and other public and municipal utilities, coops, and First Nation communities, over private corporations.

OPG is a wholly owned subsidiary of the Province of Ontario, and any surplus profits would go back into the provincial purse; whereas private corporations are primarily interested in maximizing profits, which is inevitably at the expense of public health and safety, biodiversity, and the environment. Public interests must take priority over private interests when approving all LRP proposals, and would provide the best value for Ontario ratepayers, while avoiding the privatization of Crown assets.



## 2. Priority to Larger Projects

ORA is requesting that larger proposals take precedence over smaller projects.

Hydroelectric power generation carries numerous negative environmental and socioeconomic costs, whether large or small, and headponds, diversions, or cycling and peaking operations, are particularly harmful to the environment. These are the usual tools utilized by developers to maximize power generation on smaller rivers, in order to provide power during peak demand hours, and to take advantage of peaking incentives.

Currently there are approximately 33 small waterpower proposals (under 10 MW), moving through the approvals process, that would compromise 19 rivers to generate approximately 55 MW of real power generated (see Table 1 attached).

These 33 waterpower proposals continue to move ahead through the approvals process, and yet the 75 MW Little Jackfish River Hydroelectric Project that was to be developed by OPG was recently cancelled. The reason provided on OPG's website was that "*the province's Long Term Energy Plan released in December 2013 has indicated that the energy that would be generated by the Little Jackfish River Hydroelectric Project is not needed in the near-term.*"<sup>1</sup> Then why has the Minister of Energy ordered an additional 75 MW of waterpower for procurement in 2014?

ORA submits that it would make much more sense to pursue one high quality large waterpower project, by a Crown corporation, with proper mitigation measures such as fish passage and generous environmental flows, than to place multiple rivers at risk in the pursuit of dozens of smaller proposals that may or may be socially and/or economically viable within the next 5 to 10 years - especially considering the predictions of increased drought conditions due to climate change. Protecting and conserving freshwater resources should be a primary goal for governments.

## 3. Priority to True Run-of-River

ORA requests that higher rated priority be given to true run-of-river waterpower proposals that do not use harmful cycling and peaking operating strategies, and that incorporate upstream and downstream fish passage.

This government should not encourage or allow waterpower projects to use operating strategies that could result in significant and ongoing environmental impacts to riverine ecosystems, especially under the Green Energy Act banner.

Incentives should not be paid to encourage waterpower proponents to peak and maximize power generation during peak demand hours.

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<sup>1</sup> Ontario Power Generation [website](#).



#### **4. Dispatch/Curtailment Requirements**

All contracts for waterpower facilities, both large and small, must include the provision for dispatch/curtailment. If the project is too small to maintain sustainability under this provision then it should not move forward.

#### **5. Access Rights**

All land and lease agreements must be secured with binding agreements before an LRP is granted.

There are currently proposals going through the EA process that, after 4 to 5 years, still have not made binding agreements with private land owners for land crucial to the viability of the project. This is a waste of Ministerial staff time and resources, as they have worked extensively with the proponent/s over the years, and still have no binding agreement in place.

Thank you for this opportunity to comment.

Respectfully,

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Cc: The Honourable Bob Chiarelli, Minister of Energy - [Minister.mah@ontario.ca](mailto:Minister.mah@ontario.ca)



**Table 1 – Current Waterpower Proposals under 10 MW with FIT Contracts:**

Following is a list of waterpower proposals that we are aware of. There is no complete list available to the public, so this list may not reflect all current proposals.

	RIVER	FIT PROJECT	Installed Capacity MW	Actual Power MW
1	Kapuskasing River	Outlet Kapuskasing lake	2.5	1.3
2	Kapuskasing River	Lapinigam Rapids	8.2	4.1
3	Kapuskasing River	Middle Twp.	5	2.5
4	Kapuskasing River	Near North Boundary	3.8	1.9
5	Larder Lake	Raven Falls	1.3	625 kw
6	Ivanhoe River	Third Falls	5.1	2.6
7	Ivanhoe River	The Chute	3.6	1.8
8	Frederick House River	Wanatango Falls	4.7	2.3
9	Serpent River	Four Slide Falls	7.3	3.7
10	Serpent River	McCarthy Chute	2	1
11	Serpent River	Pecors Power Small Hydro Project	2	1
12	Blanche River	Marter Twp.	2.1	1
13	Vermilion River	McPherson Falls	2	1
14	Vermilion River	Cascade Falls	2.1	1
15	Vermilion River	At Soo Crossing	4.3	2.1
16	Vermilion River	Wabagishik Rapids	3.4	1.7
17	Wanapitei River	Allen & Struthers	2.8	1.4
18	Wanapitei River	Secord Rapids	750 kw	475 kw
19	Shaw Dam Lake	Shaw Dam GS	200 kw	100 kw
20	Little Rapids	Little Rapids GS	200 kw	100 kw
21	Clyde River	Herron Mills Waterpower Project	156 kw	78 kw
22	Grand River	Elora Hydro Electric	1	500 kw
23	Mississippi River	Almonte GS	5	2.5
24	Mississippi River	Enerdu Hydroelectric Project	1	500 kw
25	Twelve Mile Creek	Shickluna Small Hydro Project	4	2
26	Kawartha Lakes	Northland Power Hydropower Project	500 kw	250 kw
27	Drag River	Drag River GS	300 kw	150 kw
28	Kabinakagami River	Neeskah Project	6.5	3.3
29	Kabinakagami River	Peeshoo Project	6.5	3.3
30	Kabinakagami River	Wapoose Project	6.5	3.3
31	Kabinakagami River	Wahpeeston Project	6.5	3.3
32	Trout Lake River	Trout Lake River Hydro Project	4	2
33	Namakan River	High Falls Hydropower Development	4.5	2.3
		Total Hydroelectric Proposals - MW	110	55

**Note:** 33 waterpower proposals will compromise 19 Ontario rivers and their ecosystems to generate a net of approximately 55 MW of power under the Green Energy Act. Seasonal flows limit actual power generated to approximately 50% of Installed Capacity.