

Charting the Course Ahead

Feed In Tariff 2.0 Review Process

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A Message from the Author

On Monday October 31st, 2011, Ontario's Minister of Energy, Hon. Chris Bentley, announced the launch of the scheduled two year review of Ontario's Feed-In-Tariff program. The review, led by Deputy Minister Fareed Amin in conjunction with the Ontario Power Authority is an opportunity for stakeholders to provide feedback on the successes and shortcomings of the FIT program based upon two years of experience.

As the author of the Ontario Green Energy and Green Economy Act (2009), I feel strongly that the ongoing success of the GEA is important to Ontario's future. I am pleased to provide my most direct assessment of the policy, outlining both areas of concern and recommendations for bold action to ensure the program's long-term success.

Reflecting on the times, this document concisely details the motivations for implementing the FIT procurement system and my related expectations for creating a green energy economy in Ontario. In it, I provide a candid assessment of where policies have fallen short of expectations and how, by making crucial adjustments, we can finally realize the GEA's full potential for growing Ontario's green economy. For certain, billions of investment dollars have been mobilized that will continue to employ more Ontarians and establish us in a global growth sector.

To be clear, the GEA and the FIT program have experienced some shortcomings despite the best efforts of many. We have succeeded in our original goal of establishing Ontario as the leading jurisdiction for renewable energy jobs and investment in North America, but leadership is not without its challenges. The challenge now is to address the unintended oversights and consequences and apply the lessons we have learned. The changes recommended here will help to fully realize the benefit of the Green Energy and Green Economy Act for all Ontarians.

A handwritten signature in black ink that reads "George Smitherman". The signature is written in a cursive, flowing style.

George Smitherman

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Response Overview

Objective

My intention is to provide some much needed clarity on the motivations and expectations for adopting a FIT program in Ontario. More importantly, I have provided a bold vision for the FIT 2.0 program that will help the Province realize its full potential.

Approach

This submission will utilize a retrospective approach in conditioning recommendations.

Evaluating the need for action against our initial expectations, I have taken the time to review the original plans for the Green Energy Act and compared those with actual outcomes. I have also consulted with many of the original architects and proponents of the FIT program in order to gain their insights into the program over the last two years. More importantly, because of the policy's far-reaching implications for all Ontarians, I opened up our consultation process to the public using SoapBox's innovative stakeholder engagement platform, allowing many more to inform our work.

Underlying Principles

This work is guided by key principles that should underpin Ontario's economic policies if we are to be successful in fostering an innovative, high growth economy in our province.

- The need to deliver superior service to citizens and investors.
- The need to deliver greater certainty to proponents and investors.
- The need to provide broader transparency to ratepayers and investors.
- The need to ensure more widespread community benefit for taxpayers.
- The need to better coordinate Ontario's long-term economic development strategies.

Vision for a Green Economy in Ontario

The Green Energy and Green Economy Act (2009)

In 2008, in the wake of the most severe economic recession in many decades and the rapid collapse of the North American manufacturing industry, the Ontario government set out to build a new innovative technology based industry in Ontario, enhanced through the creation of the Green Energy Act by the pursuit of two complementary goals:

1. Accelerate Ontario's energy independence through the greening of our energy system by shutting down dirty coal generation and replacing it with emission free sources of power. This in turn contributes to a reduction in health care costs onset by dirty air.
2. Establishing Ontario as the leading jurisdiction for renewable energy generation and manufacturing in North America, creating 50,000 jobs in three years.

The policy was supported by "two equally important thrusts: first, making it easier to bring renewable energy projects to life, and secondly, creating a culture of conservation, one where we go about our daily lives using less energy." (*Hon. George Smitherman, February 2009*)

The GEA and the related FIT, focused on creating a vibrant renewable energy market place by providing stakeholders with certainty of price, grid connection and regulatory process. In doing so, we gave a clear signal to the renewable industry that we were prepared to create the environment for a thriving Ontario green economy. "The Green Energy Act ...would make this province the destination of choice for green power developers and incent proponents, large and small, to develop projects by offering an attractive price for renewable energy and the certainty that creates an attractive investment climate: certainty that power would be purchased at a fair price; certainty that wherever feasible, the power would be connected to the grid; certainty that government would issue permits in a timely way." (*Hon. George Smitherman, February 2009*)

The Green Energy Act was custom designed to ensure that Ontario took the lead in the race to develop a green economy capable of supplying the rapidly expanding North American renewable energy market place. Unlike the previous RFP process, which only benefitted large

developers with huge projects and significant economies of scale, the FIT was also designed to be consistently applied for proponents of all sizes, to ensure that all Ontarians had the opportunity to benefit from participating in and enabling energy projects.

In clearly establishing the price we would pay for each source of energy at the outset, the FIT provided both the transparency and certainty that renewable energy stakeholders required to be able to plan for and finance their projects during turbulent financial times. The act explicitly sought to encourage the development of community based power through a price adder for local “community” projects and for projects that involved the participation of First Nations communities. It also provided certainty to rate payers that they would pay a set price for their energy and not be exposed to the risk of budget overruns of any kind. This, coupled with our provisions for domestic content, created a spike in demand for made in Ontario renewable energy products which has attracted manufacturers in significant numbers.

The GEA promised to facilitate the success of these projects by also offering an “as of right” guarantee to project proponents, a further source of certainty. The guarantee meant that, if they built a project with an Ontario FIT contract in hand, we would connect their project to the grid.

Our most ambitious effort was to implement a streamlined regulatory approvals process, specifically designed for renewable energy generation projects. The streamlined REA was to provide certainty to proponents about what was expected from them and what they could expect from the Government in terms of processing time.

Finally, in creating the GEA we envisioned a powerful Renewable Energy Facilitation Office that would act as a single window for industry, ensuring all the relevant government Ministries and regulators worked diligently to meet an established REA permit processing window.

Coupled with a robust, centralized approach to energy conservation, and a community based approach to project participation, all of these policies were to position Ontario as a leader in green energy.

GEA Outcomes – Two Years Later

Achievements to Date

As outlined in Ontario's 2011 progress report and confirmed by Ontario's Auditor General, the Green Energy Act has successfully attracted the interest of thousands of renewable energy developers and created thousands of jobs. Project developers with contracts and agreements in place for more than 6,500MW of clean green electricity have amassed billions in capital for investment in Ontario and manufacturers have followed suit with impressive capacity having been established. In all, nearly \$26 billion worth of private investment has been committed to Ontario.

As of November 2011, Ontario had received approximately 53,000 FIT and Micro-FIT applications, representing over 20,000MW of renewable power. These projects have already created thousands of green jobs even before peak production has been reached.

Implementation Challenges

Being a leader in a new industry has its risks and Ontario's own experience with the Feed-In-Tariff has been turbulent and challenging. The promise of certainty has fallen far short, particularly with regulatory approval processes and in the area of grid connection. On a positive note, financial capital and businesses of all sizes have maintained their confidence in the Ontario market with actual project development and related manufacturing set to intensify.

Government Regulatory Overload

In our eagerness to create a bold, visionary policy that would position Ontario as a leader, we were guilty of overlooking some critical barriers to success. Nowhere was our failure more notable than in our inability to anticipate the barriers presented by the government's own regulatory structures.

The GEA anticipated at its core that we would create certainty in the marketplace by establishing a streamlined REA process, bolstered by a Renewable Energy Facilitation Office (REFO) powerful enough to keep the multiple government bodies accountable to an established

processing window. In practice however, the REFO became just another flavour in the mix of Ministries and Agencies involved in the project approvals process.

Many projects have become stalled in the ECT and CIA processes managed by Hydro One. The Auditor General stated in his recent annual report that approximately 3,000 FIT applications, totalling 10,400MW of power could not be connected to the grid due to constraint issues. This constraint was caused partially by unexpectedly high interest from proponents, but is perhaps equally the result of poor planning on Hydro One's part, which lacked the necessary responsiveness to ensure the successful integration of projects. The situation has been made even worse, by their arbitrary application of a 7% cap on grid connected, mainly roof top projects, a policy meant to protect them from "islanding" issues. In a recent study by Essex Power investigating this issue, the utility concluded that the limit could be easily doubled to 15%, which is closer in line with international standards, without unnecessarily increasing system risks. This small change would allow many of the constrained projects to connect to the grid immediately.

Our inability to anticipate at the outset how this badly siloed environment would respond, has created uncertainty for the sector, effectively stalling the development process and resulting in added cost and frustration as Commercial Operation Dates required extensions.

Rampant Success of the Micro-FIT Program

The success of creating a green energy economy in Denmark and Germany had a lot to do with the number of people involved either as owners of a share of a wind farm or as hosts to a solar array installed on the family home. True to form, Ontarians in the tens of thousands have applied for a micro-FIT contract to host an array on their family home or farm. However, the program has become a victim of its own popularity, generating a level of application that has overwhelmed the system and diverted human resource focus. Representing approximately 81% of all applications received to date, but only 2% of potential power generation, the Micro-FIT program has experienced massive back logs in the OPA's application review process and hindered the agency's ability to perform necessary compliance tests required for the issuance of contract offers (ECT). It could be argued that this competition for resources has in turn

delayed larger projects, slowing the creation of jobs and the development of Ontario's green economy.

Unfortunately, the Micro-FIT program has also been subjected to political gamesmanship which has seen the public being deliberately misled about the impact on their hydro rates. While the Micro-FIT ranges were established to ensure an adequate return rate for projects of all sizes, opponents have used the 80.2 cents per kWh figure, reserved for only the smallest rooftop projects, to distort public opinion about the real cost of the FIT program. By creating transparent prices for renewables through the FIT and Micro-FIT programs, but not creating equally transparent pricing for other forms of energy generation (nuclear, gas, coal etc.), we unwittingly created an opportunity for political gamesmanship.

Finally, the intent of the Micro-FIT policy was to create multiple points of generation closer to loads, thereby benefitting from avoided transmission costs.

However, in practice, Micro-FIT projects did not always get

contracted where they were most needed. In many cases, projects were being built in grid constrained areas or areas where limited system benefits would be realized by the local generation of energy. We have since learned a lot about how we can deploy solar energy to enhance the reliability of the electricity distribution system in local communities. For instance, can the future reliability Toronto's electricity system be solved by solar rather than a costly and disruptive new transmission line?

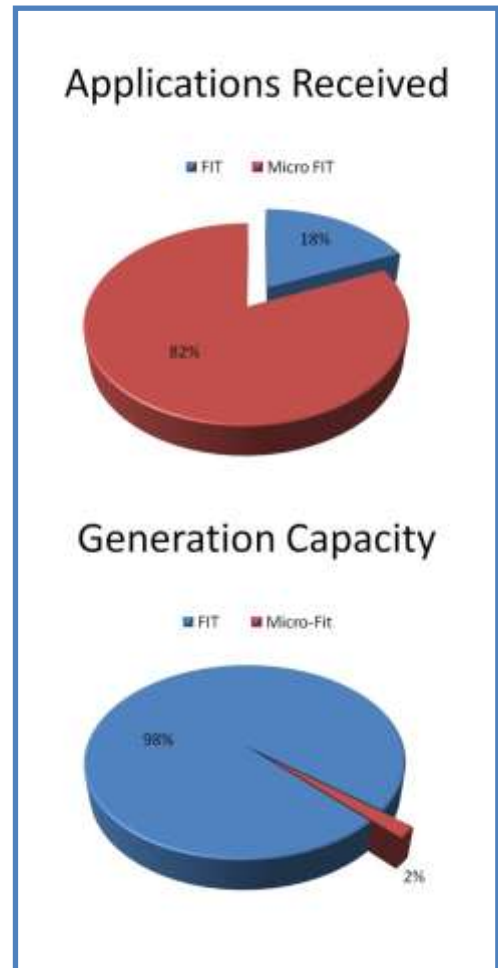


Figure 1: FIT and Micro-FIT Contracts
(Source – OPA, November 2011)

Local Opposition and Siting Issues

My experience in Denmark showed me that local ownership of projects was an important part of the social contract for the implementation of a green economy. The model that emerged here did not do enough to encourage local resident investors.

In Nova Scotia, their Feed In Tariff program establishes a minimum level of local ownership. This condition should be implemented, beginning with projects on the ECT list. This would also regulate the size of the projects, ensuring their relationship to the number of interested local investors.

In 2010, The Ministry of the Environment appointed Dr. Siva Sivoththaman at the University of Waterloo as Ontario Research Chair in Renewable Energy Technologies and Health. Dr. Sivoththaman was allocated \$1.5 Million to conduct a five year study, looking into the reported health effects of wind energy. Efforts to make his work accessible to build knowledge and confidence are recommended given the rage of concerns that have materialized.

The streamlined REA process was intended to create a consistent policy for the siting of projects in order to ensure equally high standards in all Ontario projects. Municipalities had been asking for the support because they were under-resourced to appropriately handle these complicated technical issues on their own. Unfortunately, the uploading of responsibilities to the Province was seen by some as an affront to local authority and created a symbolic rallying cry for opponents of renewable energy projects. It is an issue that must also be addressed.

Growth of the Ontario Green Economy

The Green Energy Act envisioned the creation of a thriving green economy in Ontario that would emerge first to satisfy the Ontario market and subsequently supply neighbouring North American markets. In order to create that economy, we required an environment with price certainty and market certainty and minimum domestic content policies. These policies anticipated a time line that would have maximized opportunity during the program's initial two year period.

Issues with REA processing delays and grid capacity constraints have delayed investment, project development and job creation. The good economic news is that vast arrays of companies have moved to Ontario and many others from here have emerged or grown. On top of that billions in capital await allocation. The sequencing has been badly impacted by the slowness of the Renewable Energy Approvals process and we are now left to anticipate major hiring and investment as the Commercial Operation Dates for hundreds of projects draw near.

As we contemplate FIT 2.0 it is crucial that the industry come together, creating a dynamic and cohesive Team approach. The emergence of an Ontario Green Energy Team approach is a crucial objective for the economic prosperity of Ontarians. The Government of Ontario through the Ministry of Economic Development and Innovation should also provide support to the sector in its strategies to build export markets.

Despite difficulties in sequencing and the unfortunate elongation of processes, Ontario has emerged with a critical mass of experience and competent players in areas such as finance, legal, development and manufacturing. If we act now we can still benefit from the early mover status established by the GEA of 2009.

Recommendations

Greater Energy System Transparency

Transparency is a guiding principle of the government, but it has translated poorly into the Ontario energy industry. In this comment period, it is one of the few principles that renewable energy stakeholders have agreed on as a priority. Transparency about the cost of energy, procurement practices, grid constraint issues, the approvals process and about public benefit from these investments will be critical to ensuring more Ontarians understand the value of the investments the Government is making, while at the same time re-injecting the necessary degree of confidence into to the market.

Price Transparency

- 1) Extend price transparency to all new sources of electricity generation.

It is important to give clarity to the public about the true cost of power. The FIT provided a transparent price for the cost of renewable energy but, this price transparency must now extend across all energy sources, including nuclear, gas and coal and should, where possible, take into account all system costs including avoided costs such as those related to new grid investments, health costs, environmental impact and cost overruns. This price transparency will create a level playing field for all energy sources, allowing residents and ratepayers to compare energy costs.

Rate Payer Protection Mechanism

- 2) Implement an automatic price adjustment mechanism to ensure that rate payers can benefit from reductions in the cost of renewable energy technology.

The FIT was created with a two year waiting period before the first review of prices, in order to provide added stability to the market place and foster growth. Now that the market has been established, it is important that new mechanisms be built that adjust prices more regularly so that rate payers may benefit from price reductions. However, in order to not create uncertainty or instability in the industry, rates should be adjusted regularly in

accordance with a pre-established schedule and should only affect new contracts, including those in ECT, on a going forward basis.

- The model could be based upon a weighted basket of components, or on the deemed purchasing power generated by minimum annual levels of activity.
- The model could structure contracts with a pre-established digression schedule.

Grid Transparency

3) Provide greater transmission and distribution system transparency.

Increased visibility into the Province's transmission and distribution grids would provide a clear signal that prospective renewable energy entrepreneurs can use to plan projects and could be used to help ease grid bottlenecks and address supply shortages as required. This information must be easily accessible and more detailed than the information currently used and should be built with an eye to allowing more projects to connect. This is necessary to reduce the number of stranded projects, which are slowing down the approvals process.

A. Focus Hydro One on connecting projects and realizing the benefits of distributed generation on the total grid.

Hydro One should be more focused on anticipating problems and proactively developing solutions that will allow for the connection of projects. This work should be undertaken hand in hand with the sector and third party experts. Experience from around the globe would be beneficial. According to the Auditor General's report, approximately 3,000 FIT applications, totalling 10,400 MW of power could not be connected to the grid so far. Projects that would help realize our goals under the GEA.

B. Need to provide transparency to stakeholders around grid constraints.

Hydro One should clearly identify sections of the grid that are currently constrained and those where distributed generation would help ease supply or distribution system constraints. Where the grid is constrained, they should identify the necessary investments required and immediately communicate costs and timelines for resolution

to the public. Where projects are negatively impacted by grid constraints, or proponents choose not to proceed with their projects, the OPA should provide a timeline for proponents to either move their projects to a suitable connection point, or drop out of their contracts and receive a refund of their security deposit.

At an aggregate level, OPA and Hydro One should clearly communicate to the sector both the number of MWs and applications that the system is capable of connecting each year so that investors can plan accordingly.

C. Need to move forward on implementing smart grid to allow distributed generation.

Smart Grid is a very broad term that can be interpreted differently depending on the utility or the market. However, at its core, the smart grid is a sophisticated communications system equipped with automation and controls and overlaid on top of the energy system. The ability to monitor, control and self heal would allow the grid planners and the LDCs to more effectively use renewables and deal with the issues that have stifled further adoption of renewable energy. Plans for the implementation of the Smart Grid should be made publicly digestible.

Greater Local Participation

Improve Local Authority over Large Projects

- 4) Limit the size of new wind projects to 50 MW and provide Municipalities First Nations with the right to waive size restrictions.
 - A. Most projects would be automatically restricted to 50MW,
 - B. Planning of larger projects would require direct participation and approvals by local government.

Promote Local Ownership

- 5) A minimum local ownership benchmark of 10% should be established in new FIT contracts.

The Green Energy Act envisioned the growth of community owned and operated projects. Developers were further encouraged to partner with local residents and First Nations communities through the use of a price adder. Unfortunately, most power developers did not heed the advice to involve local community partners/investors in the development of local renewable energy projects beyond the prescribed consultation process.

Promote Community/Co-Op Models

- 6) Co-operative models including those for farm based projects should be encouraged to develop, especially in light of the recommendations above.

In order to encourage the growth of community power and following closely with the successful Danish and German models, we recommend that necessary adjustments be made to Provincial regulations and the to FIT program to ensure that Co-Op structures of various kinds are encouraged as a model for community based investment in renewable energy projects. Many changes were made under the GEA to allow Co-Operatives to invest in renewable energy generation projects and to flow that benefit to their members in accordance with their by-laws. Co-Operative models allow property owners and average Ontarians to invest into and reap benefits from larger development projects that would otherwise only be available to private developers. Although some measures are already in place, more needs to be done to ensure that this model realizes its potential.

Prioritize Allocation of Resources

Improving the timeliness of the REA process is essential to delivering greater project certainty. The challenges involved with connecting thousands of points of generation and managing an entirely new way of doing business are real. Strong centralized leadership and planning will be essential to ensuring the future success of the REA process and of the overall industry going forward.

Renewable Energy Approvals (REA) process

7) Return certainty to the REA process.

We have made great strides in securing the interest of the global renewable energy industry here in Ontario and we've seen the emergence of strong, confident local players too. Much of that success is owed to the strong positive signal we gave to stakeholders when we enacted the GEA and implemented the FIT but, more needs to be done to cement that investment. It is imperative that the Government take this opportunity to send a strong signal to stakeholders that re-establishes our commitment to providing certainty for the industry in the following ways:

A. Bolster role of REFO.

Empower the REFO by providing it with the necessary mandate to hold all parties accountable to their approvals process guarantees. Centralize all REA processes through the REFO. Hold the REFO accountable to established metrics.

B. Enhance the role of the OEB as Enforcer.

Hold Hydro One and the LDCs accountable to timelines for connecting projects providing greater certainty to proponents on grid connection timelines.

Saving Money/Improving Focus

8) Consolidation of Agencies (OPA/IESO/H1)

The planning function of the Ontario Energy System has been split between three agencies and has only helped to bulk up these entities with limited benefit to the ratepayer. In order to break down the communication silos that exist between these agencies, and derive efficiencies of scale, they should be merged into a single planning agency.

- A. Align all system planning functions under a single agency.
- B. Remove \$200M in annual costs and streamline structures across all Agencies.
- C. Sell off H1 Urban distribution assets and use capital to reduce long term debt.

Micro-FIT Restructure

The Micro-FIT program has disproportionately drawn resources away from more provincially significant projects with economic benefits for Ontario and should be separated from the FIT program altogether and offered through other mechanisms.

9) Scope existing Micro-FIT program and replace with nega-watt program.

Small distributed generation projects should be implemented in a way that ties these projects more closely to the benefit they provide to the distribution grid. Some utilities have already begun exploring ways to prioritize the connection of roof-top solar projects in order of the benefit they provide to the system.

- A. Existing Micro-FIT contracted projects should be implemented as planned - all we can connect to grid.
- B. Scope the program so LDC's are obligated to direct Micro-FIT projects to areas of the distribution network that would derive the greatest benefit.
- C. Structure program so that all new Micro-FIT applications are handled by the LDC, thereby relieving pressure on the OPA.
- D. Establish a reasonable price for the projects and limit projects to individual owners.

Principles for Building a Sustainable Green Economy

Clean Air

The motivations for Green Energy in Ontario came from the determination of the people to eliminate the use of coal fired generation. If nothing else, the disappointing COP 17 negotiations at Durban highlighted the vacuum of leadership that exists today on this issue. Continuing to reduce our reliance on fossil fuels isn't just good for the air, but also for our health, our economy and our children's future.

Energy Security

Reducing our reliance on fuels like coal, natural gas and uranium improves Ontario's overall energy security. As those resources become more scarce and more costly, the ability to rely on the natural energy we can harness within Ontario will be increasingly important to our independence.

Jobs for Today and Tomorrow

Few sectors show as much global growth potential as Green Energy and Ontario has climbed into an acknowledged leadership role on the North American continent. Confident policies which establish a long-term market here, aligned with cutting edge research will ensure Ontario's share of the economic pie.

According to the International Energy Agency, in the last five years, the investment in the development of renewable energy projects and technologies has begun to outpace investment in the exploration and development of oil as a source of energy. According to Bloomberg New Energy Finance's recently released Renewable Energy Finance Report, the global renewable energy market is currently estimated to be worth \$225 billion and is projected to grow to nearly \$400 billion by 2020. The U.S. and Canada alone are expected to hit \$50 billion by 2020. We are well positioned today to become an integral part of the development of the industry in our own back yard by doing what we do well, exporting advanced manufacturing products developed with the benefit Ontario's unique expertise and technology.

In order to exploit this opportunity, it is critical that we make the right decisions for the future of the GEA and the FIT, guided by the right principles. We must provide our stakeholders with the certainty they need to make the right decision about our collective energy future. Our stakeholders, which include developers, manufacturers, financiers, but most importantly, the people of Ontario, need to understand clearly that the government is committed to the success of our green economy.

Conclusion

The objectives which informed Ontario's Green Energy policy are as relevant today as when they were born a few years earlier.

Clean air has measurable economic benefit and despite strong headwinds the global green energy market is expected to expand rapidly. In this context North America with its huge electricity demand and reliance on coal represents great market potential.

Ontario's experience or the experience of companies in Ontario has not been universally positive, however, the capacity of Ontario based companies to advise, finance, build, manufacture and operate has elevated us to the leading North American jurisdiction and an acknowledged leader worldwide.

Diversifying forms of production has proven economic and environmental benefits but we should not overlook the enhancements to energy security that occur when we stop importing fuel in favour of fuel sources which are available domestically and are free.

Having done the heavy lifting to get Ontario to the front of the pack in North America it would be foolhardy to turn back. Instead a Team Green Energy Approach should emerge underpinned by a strong, cohesive sector and the active encouragement of the Government of Ontario.

Appendix

About the Provincial Auditor's Report

In the midst of preparing my response to the FIT review, Ontario's Auditor General released a report concerning the adoption of the Feed in Tariff and Ontario's Green Energy Policies. Since I was never asked to speak to him or given the chance to answer any questions, I offer a partial response here.

The Auditor's Commentary on Ontario's Green Energy Policy was curiously long on policy critique and short on financial analysis. It seemed that the Auditor might not be aligned with the commitment to eliminate coal fired electricity in Ontario, something the people of Ontario have had the chance to vote on three times.

Here are a few things the Auditor doesn't acknowledge and are material to the decision to implement a Feed In Tariff procurement model.

Ontario is pursuing green energy for the double financial impact of reduced health care costs on the one hand and the emergence of Ontario as a North American leader in Green Energy on the other. While acknowledging job creation and new manufacturing, the Auditor uses foreign studies that do not fully take into consideration the realities of Ontario's economy or the value of jobs gained as a basis for his criticisms.

The Auditor favours the RFP procurement model to structure his argument that the FIT model is more expensive. Interestingly, the RFP model, while not being as transparent also does not take into account the value of economic activity generated under the GEA. The FIT levels the playing field and lets new and smaller entrants in, which has contributed to the emergence of many domestic companies and given rise to opportunities for First Nations and Farmers to participate.

In order to produce a number of that says the FIT model costs \$220 million dollars more annually than the RFP model, the auditor uses old price information from an RFP process as a comparison to the rates paid for FIT. Not only is the data out of date, there were substantial

variances amongst the bids in the RFP process, meaning that the “average” of the RFP Prices could have shifted upwards with the collapse or retreat of only one bid.

Given the risk that taxpayers and ratepayers have been forced to take on related to cost overruns for electricity projects including nuclear and hydro it’s also somewhat odd that the Provincial Auditor did not offer a cost benefit for the risk transfer in the FIT model where the project developer is on the hook for all such risks.

Having previously been criticized by the same Auditor for moving too slow, I took particular interest at being told that the Government went too fast. It’s important to remember that the Government had already deployed a FIT styled renewable energy program called RESOP and had the experience with the RFP mentioned above. Nobody should be allowed to pretend that modeling the FIT was some particularly foreign concept. The Ontario Power Authority and Ministry of Energy Staff proved highly accomplished in their program development and the fact that in relatively short order we have generated so much investment activity should be a source of encouragement not cause for discouragement.

As a former member of the Ontario Legislature I have a high regard for the Office of the Auditor and value the function that it provides. However, as Government has grown more and more complex the Auditor’s reach is necessarily limited to a small number of the functions of government.

A greater commitment to Transparency, such as that achieved by the FIT product is the surest protection for the taxpayers.