

NANTICOKE NATURAL GAS-FIRED GENERATING PLANT GROUNDS FOR OPPOSITION

The CAE Alliance is in the process of making a Request to the Director, Assessment and Approvals branch of the Ministry of the Environment to refuse approval for the Nanticoke Natural gas-fired generating plant. If this is not within the scope of the Director's mandate, we are asking Ms. Garcia-Wright (Acting Director) to elevate this project to an Individual Environmental Assessment, (category C project) which requires more stringent assessments.

It is the legislated duty of the Ministry of the Environment to protect the people of Ontario with respect to **all** that this encompasses. This means that the project developer must reassure the public and the applicable Ministries that there will be no significant adverse impacts to:

- air, land or water;
- plant and animal life, including man;
- the social, economic and cultural conditions that influence the life of man or a community;
- any building, structure, machine or other device or thing made by man;
- any solid, liquid, gas, odour, heat, vibration or radiation resulting directly or indirectly from the activities of man, or;
- any part of combination of the foregoing and the interrelationships between any two or more of them.

There are a number of laws and regulations that must be satisfied. The Provincial Policy Statement under the Planning Act determines that projects must satisfy additional criteria including:

- Impact to the availability of natural gas resources;
- Efficient and sustainable use of water resources;
- Protection of natural heritage including protected areas and endangered species;
- The long-term prosperity and social well-being of Ontarians - maintaining strong communities, a clean and healthy environment and a strong economy

1. The Project developer has not provided sufficient information regarding air emissions and other contaminants that could impact air and water.

The developer has not provided information regarding greenhouse gas emissions.

2. The project will use large volumes of water, up to 43,100,000 litres/day - 90% of which will be evaporated.

3. The project will use large volumes of natural gas. New pipeline infrastructure will be required to pipe the gas from the Hamilton area. (The use of natural gas to replace coal fired generation will take more natural gas than what is currently used by all residential consumers, combined.)

4. Natural gas supplies are on the decline in Canada. This will impact both cost for fuel for this gas plant (fuel costs are about 90% of the overall operating costs of a natural gas plant) and reliability of power supply.

5. We need different "types" of power production in Ontario.

Baseload for the minimum daily requirements from resources that run continuously (nuclear and hydro);

Intermediate generation from resources that can rapidly increase or decrease production to follow the constant fluctuations of power demand in a day;

Peak resources that are required for peak times of day and peak seasons, such as very cold or very hot weather (air conditioning).

Coal fired or natural gas fired are necessary intermediate load - nuclear, wind, solar cannot provide the right characteristics and we don't have enough hydro (water) in Ontario.

In order to remove coal-fired resources, the government is implementing a great deal of natural gas-fired resources - an additional 7,500MW - 9,000 MW.

6. Natural gas generated power costs 2 -3 times that of coal. The new power plants are primarily privately owned. The cost implications - including the impact on market price - are expected to result in significant cost increases, 60-70%, for electricity and higher home heating costs.

7. These costs will affect all energy consumers - business, industry, farming, schools, hospitals - thereby creating a domino effect of higher cost of living for all Ontarians. Industry and manufacturing as well as the farming community have expressed great concern regarding the use of natural gas for electricity and the resulting impact on the ability to remain competitive.

8. The environmental benefits are considered "small", according to the government's information.

9. This project will impair the local economy and reduce municipal tax revenues in that it will hasten the closure of Nanticoke GS. There are serious concerns regarding the future stable supply of efficient electricity from natural gas-fired generation in this Province.

10. The implementation of environmental controls at Nanticoke GS would provide employment for local tradespersons; would reduce emissions to near comparable with natural gas. Further, the use of biomass at Nanticoke GS would enhance both the agricultural and forestry industries in the province and the County.

When all factors are considered this project will negatively impact the local and provincial economy, will use vital and increasingly scarce non-renewable resources, and will do little to improve the overall air quality and climate change impacts in our Province.

For more detailed information review the CAE Alliance Request for Elevation of this project to the Director, Assessment and Approvals Branch, Ministry of the Environment.