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To: WUTC

**Date: May 22 2018** 

**Subject: Bullet statements** 

Updated 5-24-18

I have summarized the multi-page issues to one paragraph each. #3 renewable wind and #4 cap and trade are complex topics and poorly understood while description of what's happening will shock many people.

#1 has to do with exorbitant costs of electric that is bringing energy poverty to Ontario: the more the government thinks it's helping people, the more they hurt people; it's the round 1 of Ontario's Green Energy Act

#2 is similar to other comments and may have already been covered by his writing.

#3 is all about renewable wind and how and why it's a failure in Washington and Ontario and reason for rising cost of electricity in Ontario; it's a part of round 1 of the Green Energy Act;

#4 is about cap and trade describing how it is not fulfilling the dream of reducing greenhouse emissions but is instead a road to a centrally planned economy, russian or marxist; this is round 2 of the Green Energy Act and if people are not killed by Round 1 then Round 2 will certainly do the job; this was the reason for my outburst in the meeting.

#5 and #6 may not be as important.

What I have discussed in #3 and #4 is information that few realize or understand. Folks just assume that renewables and cap and trade are good, because anything claimed to be for the environment is good. Information in #3 and #4 show this is untrue. I would like to have a "fresh" mind read what I have written to agree or not and form a question for the injunction. I believe what I have discussed is almost unknown to the public who have no time to investigate these topics. There is plenty more written to add to the view I have provided.

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Statement 4 – HydroOne's acquisition of Avista brings fraudulent socialist and Marxist practices to the Avista territory that will hurt customers and perhaps destroy the electrical system. The idea is that cap and trade can be used to control greenhouse gas emissions but this purpose has been unsuccessful everywhere attempted so the idea is best described as a fool's mission. The cost of cap and tradeessentially a tax on fuelsto each U.S. household was estimated at \$20,000 from a US Senate Minority report concerning the Waxman-Markey cap and trade bill the Senate rejected in 2009. While the purpose is to reduce greenhouse gas emissions yet European countries—the only locations where cap and trade has been practices for a timefind their emissions are increasing along with rising costs of electricity and subsidies to support programs. The outlook for any economy implementing cap and trade is extremely grim as the purpose is to make fuels artificially scarce and penalize and collapse industrial civilization for their use of fuels while politicians boast of the rhetorical benefits without revealing it as "tax". Cap and trade markets have already revealed their identities as Ponzi schemes
Statement 5 Release information from the confidential protective order

Statement 1 – Many electric customers in Ontario are experiencing, even suffering energy poverty because electric bills in Ontario are rising faster than anywhere else in North America at eight times the rate of inflation; global adjustment fees added to electric bills as a result of the Green Energy Act and poor judgments made by Ontario officials result in a doubling or tripling of the cost of customer electric bills.

- 1. HydroOne's customers and customers of other utilities in Ontario are suffering because electricity costs too much. The reason for the climbing electric cost is the Green Energy Act 2009 in Ontario that requires energy to come from wind turbines and solar photovoltaic while coal-electric plants, once Ontario's cheapest source of electricity, have been ordered shut by the Provincial government. The Province has also paid exorbitant premium rates to solar and wind renewables energy generators and charges electric customers a special fee on electric bills called the global adjustment fee. The global adjustment may be double or triple the cost of the electricity used.
  - 1.1 The Act caused electric rates to rise faster than anywhere else in North America<sup>1</sup>. Energy costs have increased at nine and one-half times the rate of inflation in Ontario. Over the last decade off-peak rates increased by 149% or 8 times the rate of inflation while wages in Ontario have increased about 27% or one-third the rate of electricity (called "hydro" bills in Ontario). The \$1 billion celebrated Smart meter program is now \$2 billion, and over budget and under-performing and the major advantages unrealized<sup>2</sup>.
  - 1.2 Hydro One's electric costs rocketed to North America's highest cost electricity in 2015 at 29.9 cents/kilowatt-hour (low density urban), a direct result of green energy laws and increased again to 36 cents/kwhr in 2016. Hydro One promised to add \$285 more in 2018-2019, increasing customer billings to 12 times larger than Avista's 2016 small business rate of 7.1 cents per kilowatt-hour and 35 times larger than Chelan and Douglas County PUDs 2.36 cents/kwhr rate<sup>3</sup>.
  - 1.3 Global adjustment fee. To pay the exorbitant costs the Province has added regulatory and delivery costs to customer electric bills also called a global adjustment fee and this fee may represent 50% to 75% of a customer billing or up to three times the cost of electric usage. The global adjustment fee is the combined effect of these costs: difference between the market value of electricity and what's paid for renewables; extra cost of sweetheart deals with renewable providers; shutdown of coal plants; building of renewables; and paying renewables when not generating electricity<sup>4</sup>. The Province has only itself to blame for the high electric costs, one of ten reasons cited by the Auditor General of the dysfunctional electricity sector, saying its planning for power is broken; its Ministry of Energy operates by decree rather than planning making the traditional regulator body, its Ontario Energy Board

<sup>&</sup>lt;sup>1</sup> Getting zapped: Ontario's residential hydro prices are increasing faster than anywhere else in North American - http://probeinternational.org/library/wp-content/uploads/2016/02/Getting-Zapped.pdf

<sup>&</sup>lt;sup>2</sup> Why are Ontarios hydro bills soaring? https://ep.probeinternational.org/2016/07/08/why-are-ontarios-hydro-bills-soaring/

<sup>&</sup>lt;sup>3</sup> Rate data collected by author from utility websites in 2017

<sup>&</sup>lt;sup>4</sup> Top 10 takeaways from auditor general's report on Ontario's electricity sector https://ep.probeinternational.org/2015/12/04/top-10-takeaways-from-auditor-generals-report-on-ontarios-electricity-sector/

irrelevant; customers pay well above market for generous contracts to energy providers, essentially overcharging ratepayers \$37 billion with another \$137 billion coming due later; ratepayers have forked over \$9.2 billion in over-payments for feed-in tariffs; \$2.6 billion in conservation programs don't work; ratepayers are charged more money for deteriorating systems of Hydro One with outages lasting 30% longer and occurring 24% more frequently; Hydro One plays games the Energy Board to get more money by claiming assets are in poor condition and; Hydro One is inefficient with little incentive to become more productive as it spends money without benchmarking and fails to develop accurate cost estimates for projects.

- 1.4 Ontarians can no longer afford Hydro One's electricity and are very familiar with the battle between eating and heating first hand. The elderly couple in their 80's Dorothy and Ken Wynne of Moosonee, Ont. survive on CPP, Old Age Security and a pension. Wynne says they unplug everything and use the BBQ for cooking. Ms. Dobbyn the United Way Exec. Dir. in Bruce Grey Ont. says Wynne's story absolutely fits the definition of energy poverty. They are being told it's their fault...they left a light on. The largest bill Dobbyn encountered was \$22,000. Dobbyn has encountered people who have had to walk away from their houses because "the hydro bill is bigger than the mortgage." "It's totally a crisis. If we had 30 people in our community with the measles it would be a health crisis. We had, you know, 3,000, people sick from E.coli in Walkerton all those years ago ... that was a crisis. We had 60,000 people disconnected from their hydro and that's not a crisis?" The lack of work has left customers Kemp and Burnette of Kingston Ont. behind in payments, then their electric was disconnected, then the basement flooded without power to the sump pump, with water accumulating to three feet, and mold growing six feet up walls. With electricity off their insurance won't pay. 6 Hydro one left a family of 6 without electricity for months. To live the father brings home water from his work so family can bathe, have clean water to drink and to cook. The mom refuses to give her real name says she fears HydroOne.
- 1.5 More than 58,000 Ontarians have been disconnected from electricity due to inability to pay and more than 239,000 have been placed in "electric arrears" and may soon become disconnected from electricity. Some of those disconnected were disconnected despite

<sup>&</sup>lt;sup>5</sup> People have to choose between heating and eating: Rising hydro prices costs hit Ontarians -

http://www.cbc.ca/radio/thecurrent/the-current-for-september-1-2016-1.3744010/people-have-to-choose-between-heating-and-eating-rising-hydro-costs-hit-ontarians-1.3744013

<sup>&</sup>lt;sup>6</sup>Rising energy costs and poverty collide in rural Ontario - https://globalnews.ca/news/3080057/rising-energy-costs-and-extreme-poverty-collide-in-rural-ontario/

<sup>&</sup>lt;sup>7</sup>Hydro One leaves a family of 6 without electricity for months - https://globalnews.ca/news/3085450/hydro-one-leaves-family-of-six-without-electricity-for-months/

<sup>&</sup>lt;sup>8</sup> Ontario's Wind Power Obsession Punishing Thousands-390,000 Families Struggling

to Pay Power Bills and 58,000 Disconnected https://stopthesethings.com/2018/01/17/ontarios-wind-power-obsession-punishing-thousands-390000-families-struggling-to-pay-power-bills-58000-disconnected/

<sup>&</sup>lt;sup>9</sup> Data reported to the Ontario Energy Board by electricity distributors -

https://www.oeb.ca/sites/default/files/2013%E2%80%932016-disconnection-late-payment%20data-by-utility\_20170921.pdf  $^{10}$ Energy poverty in Ontario: the data reveals a sad situation  $^{-}$ 

https://parkergallantenergyperspectivesblog.wordpress.com/2018/01/04/energy-poverty-in-ontario-the-data-reveals-a-sad-situation/

their low-income status. These statistics betray the sad situation for Ontario citizens struggling to pay power bills. The OEB report has data on customers with load limiters installed on Smart Meters with purpose to limit electric usage. Resident Jessup from Bancroft said he could not use the microwave oven after HydroOne installed a limiter on the Smart meter. <sup>11</sup>

1.6 Other reports of customers suffering from high electric rates or disconnected from electricity are available on request.

<sup>11</sup> Increasing hydro prices are devastating rural Ontario. Jessup in Bancroft, Ont. on Youtube https://youtu.be/EAmChm584z0

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Statement 2 – Ontario's Premier Kathleen Wynne along with MPP Daiene Vernile and the HydroOne CEO Mayo Schmidt promise to transfer Ontario's values and policies about clean energy, including the Green Energy Act 2009 to Avista customers and consolidate utilities in the region. However such policies and values are contrary to interests of the United States and the Avista territory and contravene the Proclamation by President Trump to exit the Paris Climate Accord.

- 2. The Province's Premier Kathleen Wynne, a Member of Parliament Daiene Vernile of Kitchener Center Ont. and HydroOne-Avista by content of its Agreement and Stipulations with States of Washington and Idaho infer that Ontario's policies will be transferred to Avista including Ontario's policies of its Green Energy Act. The purpose of the Act is to comply with the Paris Agreement and UN's Conference of Parties on climate change. Transferring policies via the HydroOne-Avista agreement and via the wishes of Premier Wynne and Member of Parliament Vernile contravenes Pres. Trump's Proclamation in 2017 to exit the Paris Accord. The agreement is illegal. Subjecting US citizens to the Act is illegal. Secondly Ontario promises the same fate of high energy prices will come to Avista by this contravention and for the same reason outlined in (1) above. The fate and high cost of the Green Energy Act and energy poverty will afflict Avista customers as it has afflicted Ontarians.
  - 2.1 Mayo Schmidt, CEO and President of Hydro One says its beginning a strategy to expand into the U.S. market which will including snapping up other companies in the Pacific Northwest<sup>12</sup> and the latest trend in the mergers and acquisitions sector<sup>13</sup>.
  - 2.2 Kathleen Wynne, Premier of Ontario, says acquiring Avista is an action to extend Ontario's values, and Ontario's emphasis on Green Energy to Avista's jurisdiction<sup>14</sup>. Essentially she implies that Ontario's Green Energy Act is coming to Avista. Wynne's statement seems to represent a reentry of US citizens into the Paris Climate Agreement that Pres. Trump exited on June 1, 2017<sup>15</sup>, saying.... "Therefore, in order to fulfill my solemn duty to protect America and its citizens, the United States will withdraw from the Paris Climate Accord. The Paris Climate Accord is simply the latest example of Washington entering into an agreement that disadvantages the United States to the exclusive benefit of other countries, leaving American workers who I love and taxpayers to absorb the cost in terms of lost jobs, lower wages, shuttered factories, and vastly diminished economic production. Thus, as of today, the United States will cease all implementation of the non-binding Paris Accord and the draconian financial and economic burdens the agreement imposes on our country. Compliance with the terms of the Paris Accord and the onerous energy restrictions it has placed on the United States could cost America as much as 2.7 million lost jobs by 2025 according to the National Economic Research Associates. This

<sup>&</sup>lt;sup>12</sup> Avista is just the first US deal Hydro One CEO says https://www.theglobeandmail.com/report-on-business/avista-is-just-the-first-us-deal-hydro-one-ceo-says/article37043629/

<sup>&</sup>lt;sup>13</sup> http://www.spokesman.com/stories/2017/jul/21/avista-sale-latest-in-trend-of-canadian-utility-ac/

<sup>&</sup>lt;sup>14</sup> HvdroOne's new coal plant gives Ontario a chance to spread its green values https://www.youtube.com/watch?v=527VJqu0PHI

<sup>&</sup>lt;sup>15</sup> Statement by President Trump on the Paris Climate Accord Issued June 1, 2107 https://www.whitehouse.gov/briefings-statements/statement-president-trump-paris-climate-accord/

includes 440,000 fewer manufacturing jobs. According to this same study, by 2040, compliance with the commitments put into place by the previous administration would cut production in many sectors. ....The cost to the economy at this time would be close to \$3 trillion in lost GDP and 6.5 million industrial jobs, while households would have \$7,000 less income".

- 2.3 Member of Provincial Parliament Daiene Vernile of Kitchener Center Ont. says of the purpose of the privatizing of HydroOne......"our plan to broaden ownership in HydroOne is to unlock assets to build infrastructure. Offering to raise \$4 billion eventually selling 60% of Hydro One. The government will have power to appoint chair and board, power to remove board, veto authority on nomination of directors..."<sup>16</sup> However the Province will retain 40% ownership in HydroOne in order to continue to receive income in the long term. Will the income flow from Avista customers to Ontario? Is this the purpose?
- 2.4 Elsewhere, in the Stipulation Agreement made between Hydro and Avista with the Utility Commissions of Idaho and Washington, HydroOne will control actions by Avista by holding 5 of 9 seats on the new Board of Directors of the holding company that will become the new Avista. The stipulation agreement says renewable energy will be a key goal. Is the intent to use renewable energy to replace the Avista coal plants? If so that's impossible, and becomes an issue to be discussed separately. The agreement also says there will be a transfer of policies from Ontario to Avista; it implies Avista's land will be transferred to HydroOne, Avista's assets in hydro-electric dams, renewable facilities and other thermal resources will be transferred to HydroOne; Smart meters will be installed; and Colstrip plant will be shut.

<sup>&</sup>lt;sup>16</sup> Daiene Vernile, Member of Provincial Parliament for the riding of Kitchener Centre, discusses the Ontario Government's recent Hydro One announcement and its impact in the Kitchener-Waterloo Region. https://www.youtube.com/watch?v=TALKLwaonfl

Statement 3 – Closure of Colstrip electric generating plant severely jeopardizes the one-third of Avista's electric supply promised Avista customers. Reasons for cancelling this electric supply are invalid and any promise to replace Colstrip with an equal supply from renewable energy, solar or wind is empty and impossible as experience elsewhere has shown. I repeat impossible. Experience from wind electric generating facilities in Washington, Oregon and Ontario prove that wind turbines are incapable of providing a baseload power source. Attempts to replace coal by wind in Germany, Denmark, and Australia are failing in this task. Coal-fired electric generating plants like Colstrip provide a full-time and reliable supply of electric power. Problems of intermittency, inefficiency and non-dispatchability of wind turbines cannot be overcome and so cannot provide a reliable baseload regardless of size or number.

- 3. Colstrip units 1,2,3,4 that currently represent 1/3 of the electric supply for Avista customers. Closure of Colstrip jeopardizes the available electric supply promised Avista customers. The reasons cited for closing the Colstrip are invalid. The Stipulations agreement implies that HydroOne will replace Colstrip with energy from renewables, principally wind turbines, but this is impossible as explained below and as demonstrated in many countries, or regions including Ontario, South Australia, Germany, Spain. The agreement forcing Avista to release any Colstrip assets must be reversed or cancelled to assure customers have a reliable supply of electricity from a baseload source of electricity. Renewables cannot qualify as a baseload source.
  - 3.1 "Renewables" are a key part of the "Stipulation" agreement made by Avista-HydroOne and concurred by some jurisdictions. Because "renewables" are cited, I constructed these charts based on data from Bonneville Power Administration to show why wind turbines as a source of energy are so unreliable and are not baseload sources. Renewables are a serious problem, a serious threat to electric supplies that poses a serious impediment and risk to power supply as shown by the charts (1 & 2). I have added analysis to show output of Washington's (includes Oregon's) 46 wind turbine farms. Wind power is inefficient (26% efficient in Washington), intermittent, non-dispatchable, unpredictable. Specific disadvantages are: wind turbines have with long down times; wind is unable to provide base-load so requires "full-time backup" from a second power source that is available full-time for its base-load capability (coal, hydro, gas, nuclear); and wind turbines' peaking capacity is out of sequence with demand, which often requires "dumping" power when power supply exceeds demand at very high cost, or the opposite, wind power is accepted and other power is dumped or spilled, which also adds significant cost as shown in Ontario and often reviewed by Parker Gallant Energy Perspectives. Other disadvantages are their serious health consequences of wind turbine noise, called infrasound, which causes very serious health effects in people, livestock; exorbitant building code setbacks that have been ordered, with some setbacks up to 5 kilometers from turbine to nearest residence; that turbines cannot operate without subsidies, and much more. Increasing the number of wind turbines cannot overcome these disadvantages, but instead creates additional problems such as significant instability of the electric grid as demonstrated in South Australia and in Ontario (Parker Gallant), or poses threats to a nation's economy as in Germany or needlessly increases the cost of electricity without increasing assurance of supply as in Ontario, South Australia and Germany.

- 3.2 The data below present an analysis of 46 wind farms located in Washington State and Oregon. The capacity of the 46 wind farms is large at 4,782 megawatts.
  - 3.2.1 Chart 1-top: (see Chart below) This analysis shows that all 46 wind farms in Washington and Oregon generate electricity at less than 10% of system capacity for 1/3 to 2/3 of days each month. Numbers in colored blocks represent the number of days, by month January to June, for 2014 through April 2018 that the entire wind system (all 46 wind farms) produced electricity at less than 10 % of nameplate capacity. The block on the right is an average for the five years. It shows that for 10 or up to 20 days each month the 46 farms produced at less than 10% of capacity, which confirms that wind farms are not baseload.
  - 3.2.2 Chart 1-bottom: An argument was made in the Spokesman-Review that the 4 Snake River dams could be replaced by renewable energy sources<sup>17</sup>. This argument is untrue as shown. The author of the SR article does not recognize that trade of goods up or down the river or from or to Montana or Idaho or inland would be lost. This trade approached 4.5 million tons in 2014. Second, the dams are part of the 33 dams on the Columbia-Snake system that produce power to serve up to 8.45 million households, with the number of households expected to grow to 8.7 million in 25 years, so all of the 33 dams on the system will be needed to serve the future population. It follows then that neither can the 4 Snake River dams be replaced by renewable wind turbines for the reason just described and for the following reasons shown in the chart:
    - 3.2.2.1 The 46 wind farms have a capacity of 4782 MW or 37% more megawatts than the capacity of the four Snake River dams of 3489 MW yet the 46 wind farms produced only 1243 MW (at their efficiency of 26%, the average for Washington) or 64% less electricity than the 4 dams. The bottom chart shows the yo-yo nature of the wind farm output and so confirms this statement.
    - 3.2.2.2 The chart shows the number of **days each month** that the 46 wind farms produce at capacity less than the 4 Snake River dams. From the average on the right bloc, the sum is 167, or 92% of the time (167 out of 182 days of Jan.-June period) the combined production of 46 wind turbine farms electricity output is less than that of the 4 Snake River dams. This a good demonstration that the dams DOES represent base-load electrical power. Wind is NOT base-load.
  - 3.2.3 Chart 2: (see chart below) A second attachment shows the output of the 46 wind farms to date to May 18, 2018. Each bar represents one day approximately. Compare bar height (daily average output) to capacity at 4,782 MW never reached. Use the scale on the left. Second, note the several long periods below minimum output of 500 MW and the wildly fluctuating outputs. The white space denotes when wind is not producing electricity. It is safe to conclude that wind turbines in Washington, a state not known as "windy", cannot replace 444 MW of electricity that now comes from the Colstrip coal plant baseload relied on by Avista customers.

Looking again at Chart 2. Those pumping wind only ever talk about capacity, which is like being told that the check is in the mail. Those kind of fantastic promises are made by those who hope it never collides with reality. But, like the check that never arrives (and bounces when it does), promises that wind power delivers are not just hollow, they're a delusion.

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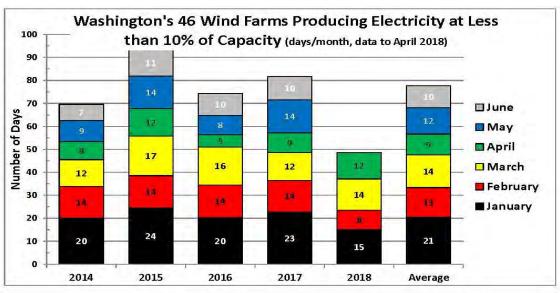
<sup>&</sup>lt;sup>17</sup> http://www.spokesman.com/stories/2018/apr/08/replacing-power-produced-by-four-snake-river-dams-/

Coal and nuclear power generation don't need a second system like pumped hydro, mythical mega-batteries or prayers to Mother Nature in order to deliver power 24 x 365, whatever the weather. These are 'systems' and, by definition, systems work. What's depicted in Chart 2 shows the entire output of every wind turbine located in Washington and Oregon connected to the transmission grid, with a combined capacity of 4,782 MW during April this year. Up and down like a proverbial yo-yo, by no stretch of the imagination can wind power ever be described as a 'system': its chaos.

For the most part, total output never topped 1,235 MW (or 25.8% of 'capacity'); spent plenty of time struggling to muster up a trifling 700 MW (or 14.6% of 'capacity') and 11 days unable to conjure up a risible 200 MW (or a laughable 4% of 'capacity'). How many homes will go without power in those 11 days? It's supposed to be 4,782 MW. Is this a joke? In short, what matters to power consumers is delivery, not capacity. Where's that mythical Ingenious Nobleman Hidalgo Don Quixote de La Mancha?

3.3 The false argument often made to favor wind turbines or that wind turbines could replace the four Snake River dams, is an argument to remove the 4 dams but this argument is false. These data from Bonneville Power Administration prove that wrong.

Chart 1 (below) Top: Shows Washington-Oregon's 46 wind farms produce electricity at less than 10% of capacity and do so regularly with the numbers in blocks representing the number of days per month that wind farm production is under 10% of capacity; Bottom- shows Washington's 46 wind farms produce electricity at less than the capacity of the 4 Snake River dams regularly, for 92% of the time (period of 167 days out of 182 days through May 18, 2018); the numbers in the blocks is a count of the number of days per month the wind farms produce less electricity than the 4 Snake River dams; remember the man in the SR article said that the dams could be removed so the renewable power could replace them, is untrue.



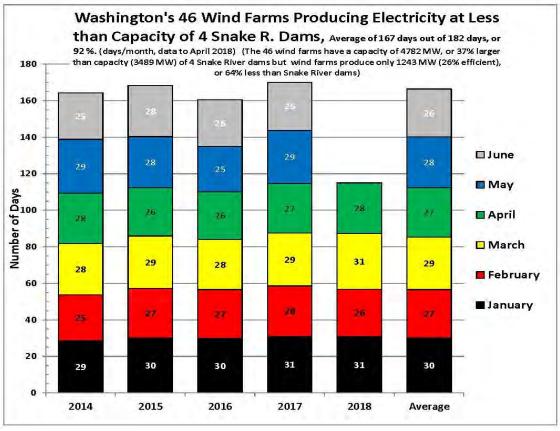
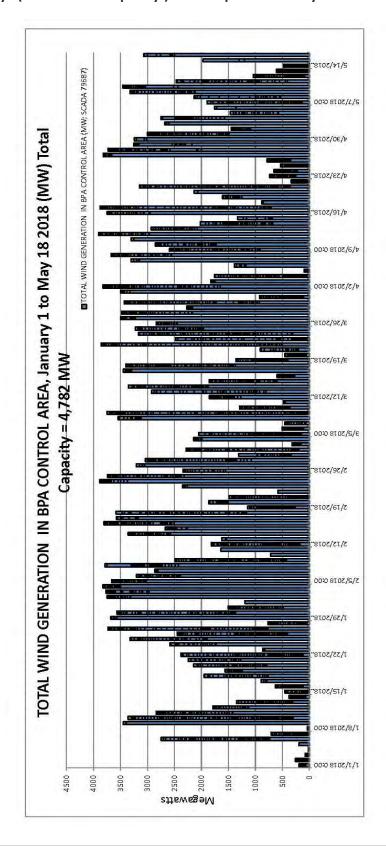


Chart 2. Total electric generation record of 46 wind farms in Washington-Oregon January 1 - May 18 in 2018. One bar is approximately one day. Total output did not exceed 1,235 MW (or 25.8% of 'capacity'); output was 700 MW for 17.1 days (or 14.6% of 'capacity') and output for 11 days was 200 MW (4% of 'capacity').



- 3.4.2 Wind turbines require full time backup from a baseload source. Baseload is hydroelectric, nuclear, natural gas or coal electric generating plants<sup>18</sup>. The normal ratio used for wind systems in Germany and Denmark is that each 10MW of wind require 8 MW of baseload power from another source as full time backup. The 4,782 MW of capacity of the 46 wind farms would require another 4782 x .8 = 3,826 MW of baseload from hydro, nuclear, natural gas or coal plants. The 3826 MW would require 3.8 average size coal plants with a capacity factor of 56% at a cost of \$6.8 billion or 6.8 average size natural gas plants with a capacity factor or 56% at a cost of \$6.8 billion <sup>19</sup>. The coal or natural gas plants must be shut and restarted or ramped up and down to adjust to the erratic output of the wind turbines. This costs money. The shutdown and re-start is estimated by one author to cost \$175,000 per re-start because up and down ramping is usually not feasible. These practices also reduce the life and increases maintenance of the plants. Can anyone answer the question: Why have two systems when just one system, with baseload, will do the job?
- 3.4.3 Denmark and Germany report that their levels of CO2 and use of fossil fuels has not been reduced since installing thousands and thousands of wind turbines.<sup>20</sup>
- 3.4.4 Wind energy is inherently intermittent and depends on Mother Nature and out of sync with demand which drives costs upward. Seasonally in Ontario, energy use is highest in the winter and summer and lowest in the spring and late fall. This is almost the mirror image of wind production in that province: wind is highest in spring and fall when electric needs are lowest and lowest in summer when electric needs are highest. In Ontario surplus baseload during peak periods cost consumers \$550 million above the cost of the wind systems so productive benefit of wind systems is low in Ontario and Ontarians used only 35% of wind generated output due to the generation misaligned with demand, so 65% of electric generated from wind that is surplus to demand is wasted (disposed or dumped) at a very high cost. This surplus cannot be profitably exported either which causes the income from wind surplus to be depressed by 39%. This underscores the low value of wind and clearly implies that wind generation is already in excess supply in Ontario. Ontario now has 3250 MW of wind that supplies about 4% of electric supply and expects to double the capacity to 6500 MW by 2025. The increase in capacity will increase the severity of over-supply so any export price of wind generated electricity will be depressed more severely. Costs of wind generated electricity are exacerbated more by low wind utilization which is the situation in WA-OR wind turbine farms. The cost of wind generation was the largest factor at more than \$1.1 billion in 2015 but additional costs came from curtailed generation of nuclear and hydro and lost revenues due to wind-depressed pricing. These factors increased the cost of wind energy to \$410/MWhr in 2015, which raises the cost of wind energy to more than four times larger than the \$101/MWhr above the average of other sources of energy for the province. So wind costs 4 times more than normal electricity. Clearly this signals that wind generation is not performing well and that adding more capacity will only raise the cost

<sup>&</sup>lt;sup>18</sup> Wind Watch www.wind-watch.org/faq-output.php

<sup>&</sup>lt;sup>19</sup> US Department of Energy www.eia.gov

<sup>&</sup>lt;sup>20</sup> Wind Watch www.wind-watch.org/faq-output.php

without providing benefit to supply.<sup>21</sup> Ross McKittrick, Professor of Economics in Ontario reports that wind power subsidies triple the cost of electricity. Parker Gallant<sup>22</sup> reports that wind generation provided only 3% of Ontario's supply of electric in March 2018 because 65% of wind generated electricity had to be wasted. That raises the question: Why did Ontario contract for it in the first place and why was it given "first to the grid" rights? And, why don't we cancel any outstanding contracts that haven't been started if what it generates is surplus?

- 3.4.5 Wind energy causes damages to property values<sup>23</sup>. Real estate and appraisal businesses maintain that wind power does affect property values. Michael McCann of McCann Appraisal, LLC out of Chicago said that "residential property values are adversely and measurably impacted by the close-proximity of industrial-scale wind energy turbine projects to the residential properties of Paintearth County Alberta," if they are up to 3.2 km away. They decrease a property's value by 35 to 40 per cent. According to the London School of Economics, wind farms decrease property value by up to 12 per cent if the home is within a two km radius and can even affect a property's value up to 14 km away from the home. In fact, the Ontario Superior Court ruled in 2013 that landowners living near large wind farms suffer from lower property values. That court said it decreased property values by 22 to 55 per cent.
- 3.4.6 Wind energy causes damages to water. In a case that concerns water supplies in southwest Ontario, 30 miles east of Detroit, MI wind turbine construction is turning drinking and domestic water supplies to toxic sludge by the same government that controls HydroOne.

  Marc St. Pierre farmer from Chatham-Kent says "toxic sludge is only good for bathing and toilets, there's no way it's safe to drink".<sup>24</sup>
- 3.4.7 Ross McKittrick, Chair and Professor of Economics at University of Guelph in Ontario says the wind power subsidies triple the cost of electricity. *The more the wind blows, the greater the use of wind turbines, the bigger the losses and the higher the hit to consumers.*<sup>25</sup> A hidden tax on Ontario's electricity has pushed the actual purchase price in the opposite direction, to the highest it's ever been. The tax, called the Global Adjustment (GA), is levied on electricity purchases to cover a massive provincial slush fund for green energy, conservation programs, nuclear plant repairs and other central planning boondoggles.... In 2009, when the Green Energy Act kicked in with massive revenue guarantees for wind and solar generators, the GA jumped from 3.5 cents per kWh, to above 9.5 cents. In April it even topped 11 cents, triple the average electric rate. So while the marginal production cost for

<sup>&</sup>lt;sup>21</sup> Ontario's high-cost wind-millstone, CCRE Commentary, June 2017 by Marc Brouillette Council for Clean and Reliable Energy www.thinkpower.ca

<sup>&</sup>lt;sup>22</sup> Quarterly stats show wind power blowing Ontario electricity costs higher https://parkergallantenergyperspectivesblog.wordpress.com/

<sup>&</sup>lt;sup>23</sup> Wind turbines affect property values https://www.wind-watch.org/news/2018/04/04/wind-turbines-affect-property-values/

<sup>&</sup>lt;sup>24</sup> Black Plague: Wind Turbine Construction Turning Ontario's Water Supply to Toxic Sludge

https://stopthesethings.com/2018/04/27/black-plague-wind-turbine-construction-turning-ontarios-water-supply-to-toxic-sludge/
<sup>25</sup> Ross McKittrick Wind Power Subsidies Triple Power Prices in Ontario August 25,

generation is the lowest in decades, electricity bills have never been higher. And the way the system is structured, costs will keep rising. The province signed long-term contracts with a handful of lucky firms, guaranteeing them 13.5 cents per kWh for electricity produced from wind, and even more from solar. Obviously, if the wholesale price is around 2.5 cents, and the wind turbines are guaranteed 13.5 cents, someone has to kick in 11 cents to make up the difference. That's where the GA comes in. The more the wind blows, and the more turbines get built, the bigger the losses and the higher the GA .Just to make the story more exquisitely painful, if the electric rate (called HOEP) goes down further, for instance through technological innovation, power rates won't go down. A drop in the HOEP widens the gap between the market price and the wind farm's guaranteed price, which means the GA has to go up to cover the losses. Ontario's policy disaster goes many layers further. If people conserve power and demand drops, the GA per kWh goes up, so if everyone tries to save money by cutting usage, the price will just increase, defeating the effort. Nor do Ontarians benefit through exports. Because the renewables sector is guaranteed the sale, Ontario often ends up exporting surplus power at a loss, often at 98%. The story only gets worse if you try to find any benefits from all this spending.

- 3.4.8 It's similar in the US. Warren Buffett says, "I will do anything that is basically covered by the law to reduce Berkshire's tax rates. For example, we get a tax credit if we build a lot of wind farms. That's the only reason to build them. They don't make sense without the tax credit." Subsides for natural gas are \$0.64 per MWhr for natural gas and coal while subsidies are \$56.29 for wind and \$775.64 for solar.
- 3.4.9 Here are renewable experiences in other countries. **Denmark-Pres**. Obama cited the Danes as the example to follow, but they pay the highest electricity prices in EU along with Germany at 43-44 cents/kwhr; pays subsidies of \$376 million per year to wind producers; subsidies pay workers up to \$140,000 per year paid to each wind job, a wage which is 250% higher than average Dane worker; wind power exports save neither CO2 nor fossil fuel use, but Danes export 57% of subsidized wind power to neighbors at almost no payment, with hope for return favors; **Spain-2.2** jobs were lost elsewhere for each renewable job created; 9 of 10 jobs ended when renewables construction ended; committed \$753,778 per green job; each green megawatt destroyed 5.39 jobs elsewhere<sup>27</sup>; **Germany-Often** cited as a model to renewable energy promotion, its subsidies for solar workers are up to \$240,000; price markup of 2.2 cents per kwhr for renewables; support for solar and wind is \$73.2 billion and \$28.1 billion, respectively; each green job disappeared when support ended; **Germany's Energy Minister (Aug. 2016)** said "our country has reached its limits with renewable

<sup>&</sup>lt;sup>26</sup> https://www.usnews.com/opinino/blogs/nancy-pfotenhauer/2014/05/12/even-warren-buffett-admits-wind-energy-is-a-bad-investment

<sup>&</sup>lt;sup>27</sup> Frondel, M., et al (2009), Economic impacts from the promotion of renewable energies: The German experience G. C.Alvarez, 2009, Study of effects on employment of public aid to renewable energy sources: http://juandemariana.org/pdf/090327-employment-public-aid-renewable.pdf Status of renewable electricity mandates in the states: Institute for energy Researchwww.instituteforenergyresearch.org/statesEnergy and consumer impacts of EPA's Clean Power Plan: NERA Economic Consulting, Insight in Economics (2015)

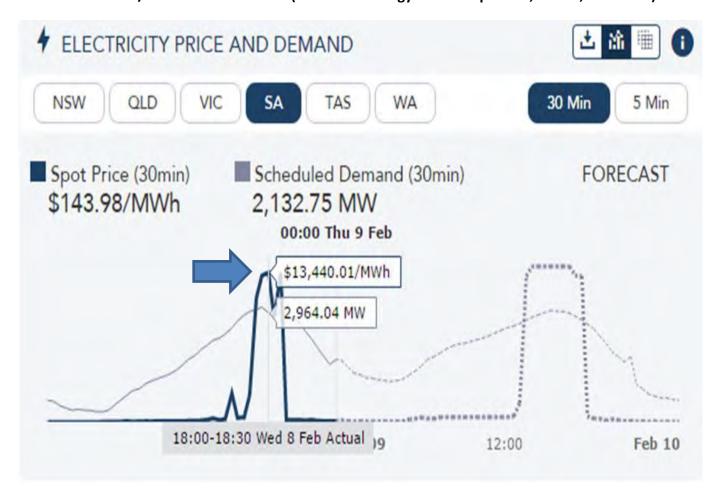
subsidies along with its electricity prices or risk de-industrialization although its CO2 emissions have risen and Germany is building 18 new coal plants to provide needed energy; South Australia<sup>28</sup>-During a winter storm event in South Australia, the SA grid experienced a cascading shutdown of all of its wind and other power stations when 7 transmission towers collapsed blamed on its over-build of wind energy, now at 41% of total grid. The Australian 5/10/2016) South Australia-Twice experienced, in December 2016 and February 2017 a heatwave causing a blackout which continued, and again the cause seems to be excessive reliance on wind farms. The up and down ramping of the turbines seems responsible for the unstable conditions. To stabilize the grid, the AEMO in Adelaide ordered the GM Holden car factory to close with loss of 14,000 jobs<sup>29</sup> See electric price chart (below)

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<sup>&</sup>lt;sup>28</sup> Rolling blackouts ordered in SA in 40°C heat: http://joannenova.com.au/2017/02/rolling-blackouts-in-sa-in-40c-heat/ The AEMO said the blackout caused wholesale electricity prices to spike to \$13,440 per MW-hr (equals \$13.44 per kwhr) https://wattsupwiththat.com/2017/02/09/south-australia-heatwave-wind-power-collapse-rolling-blackouts/)

<sup>&</sup>lt;sup>29</sup> Holden closure will help Energy Market Operator manage South Australia's blackout risk – August 2 2017 – https://wattsupwiththat.com/2017/08/02/aemo-plant-closures-helping-to-stabilise-south-australias-green-electricity-grid/

# Chart showing electricity price and demand for South Australia. Note spot price spikes to \$13,440 /MWhr at 18:00-18:30 (Australian Energy Market Operator, AEMO, Feb 2017)



Statement 4 – HydroOne's acquisition of Avista brings fraudulent socialist and Marxist practices to the Avista territory that will hurt customers and perhaps destroy the electrical system. The idea is that cap and trade can be used to control greenhouse gas emissions but this purpose has been unsuccessful everywhere attempted so the idea is best described as a fool's mission. The cost of cap and trade--essentially a tax on fuels--to each U.S. household was estimated at \$20,000 from a US Senate Minority report concerning the Waxman-Markey cap and trade bill the Senate rejected in 2009. While the purpose is to reduce greenhouse gas emissions yet European countries—the only locations where cap and trade has been practiced for a time--find their emissions are increasing along with rising costs of electricity and subsidies to support programs. The outlook for any economy implementing cap and trade is extremely grim as the purpose is to make fuels artificially scarce and penalize and collapse industrial civilization for their use of fuels while politicians boast of the rhetorical benefits without revealing it as "tax". Cap and trade markets have already revealed their identities as Ponzi schemes.

4. Ontario wants to bring fraudulent, socialist practices to Avista territory that will devastate Avista customers using forced compliance with cap and trade practices. Customers will be hurt significantly by Ontario imposing its unproven and untested values upon customers that does not serve Avista customers but rather provides a motive to extract profits via HydroOne for Ontario's purposes. Ontario's values are Ontario's Green Energy Act, 2009. They are not values of Avista customers that pay for electricity. The following statements by Premier Wynne and MPP Vernile confirm this plan to illegally export Ontario's values to Avista via the HydroOne acquisition.

Ontario Premier Kathleen Wynne speaks in a video about a coal plant owned by Avista (video July 21 2017, Kathleen Wynne, https://youtu.be/527VJquOPHI) saying that purchase of Avista is an opportunity to spread Ontario's value system, to lead the way in technology to reduce greenhouse gas emissions, to clean the air, and prepare a clean and pollution-free electric grid. Ontario's ownership of 40% of HydroOne is the tool used to force compliance by Avista customers. The values she speaks about are already underway in Ontario and damaging Ontarians. The values include the Green Energy Act 2009 and its extension the Climate Change Action Plan 2016, an act and plan which mandates use of renewables of wind and solar, closing of coal electric plants and use of cap and trade, all practices with intent for force a reduction in greenhouse gas emissions but does not produce that result. The emission targets are to reduce GHG emissions by 80% below 1990 levels by 2050, with intermediate goals of GHG reduction in years 2020 and 2030. The Green Energy Act has already caused electric rates to rise faster than anywhere else in North American rising from 3.5 cents/kwhr before the Act to 29.9 cents in 2015 and equivalent of 36 cents<sup>30</sup> in 2016. Also citing the same view is Member of Provincial Parliament Daiene Vernile of Kitchener Center Ont. mentioned earlier ..."<sup>31</sup>

<sup>&</sup>lt;sup>30</sup> 36 cents is based on N. Ontario electricity index from Statistics Canada (2018)

<sup>&</sup>lt;sup>31</sup> Daiene Vernile, Member of Provincial Parliament for the riding of Kitchener Centre, discusses the Ontario Government's recent Hydro One announcement and its impact in the Kitchener-Waterloo Region. https://www.youtube.com/watch?v=TALKLwaonfl

Middle and lower income customers will be hurt by cap and trade from its enormous tax burden on fuels

that will drive families off the electric grid. In Avista's case the entire plan will be released more rapidly than in Ontario. Cap and trade also forces utilities to enlarge their clean energy portfolios by trading to obtain clean energy assets, which includes locating assets outside of Canada or be forced to buy carbon credits that cost billions of dollars from climate exchanges in California, Chicago or Quebec. Both the purchase of clean energy assets and the purchase of carbon credits will be very costly with these costs passed to utility customers.

# CLIMATE CHANGE ACTION PLAN – Its Round 2 of Green Energy Act ONTARIO'S FIVE YEAR



 $Source: \ Ontario \ Climate \ Action \ Plan-\underline{www.applications.ene.gov.on.ca/ccap/products/CCAP}\ ENGLISH.pdf$ 

The topic is <u>cap and trade</u>, the second part of the Green Energy Act, the Climate Change Action Plan that began in 2017. Some have named it Green Energy Act Round 2 because it adds more controls on use of energy that goes beyond ending of coal plants and building of renewables. (figure-cover page of plan, below). Cap and trade is the key tool employed in the Plan.

- 4.1 The GHG reduction targets under the Climate Change Action Plan of which cap and trade is a key tool are: reduction to levels below 1990 GHG emissions by 15% by 2020, by 37% by 2030 and by 80% by 2050. These GHG reduction levels permits us to forecast the cost of compliance from 2016 forward to 2050 with a beginning carbon price (\$157/tonne in 2016) cited in the Plan and a beginning household electricity price (\$107/month in 2016) in the Plan. The forecasted combined result of carbon price and electricity cost in 2050 is \$3, 247/month/household.
- 4.2 HydroOne can raise its limits on GHG emissions, from an arbitrary "cap" now established at some level, by purchase of clean energy assets. It can trade assets, the second part of cap and trade. Purchasing Avista along with Avista's 18 company-owned hydroelectric dams (931 MW) and Avista's Palouse wind farm (108 MW) satisfies the "trade" option so HydroOne's limits on GHG emissions may be re-established at a higher level. The purchase of Avista for \$6.7 B is \$1.3 B less than the cost to purchase carbon credits from the Calif. Exchange. This provided

several advantages. It saves \$1.3 B. HydroOne would take ownership of assets instead of cash paid to California if credits were purchased and the assets, Avista Corp., could be operated under Ontario's watch and would provide income to HydroOne and Ontario by Ontario's 40% ownership share in HydroOne.

- 4.3 In a sprint to purchase or avoid or comply with the *Green Energy Act's* 2020 timeline the program that forced *Cap and Trade* carbon emission trading also seems responsible for a "raiding" of U.S. utility companies by Canadian utilities<sup>32</sup>. The Canadian companies purchased \$74 million of U.S. hydroelectric assets in 2016, \$28.7 billion more by February 2017 with \$80.8 billion in acquisitions to date<sup>33</sup> to apparently feed Ontario's insatiable need for green power assets to reduce its GHG emissions according to the Green Energy Act. Forbes listed 11 other U.S. utilities targeted, which include firms in nearby states, IdaCorp, Northwestern (MT), MDU Resources (ND, MT), Portland General Electric, and Westar (UT, KS)
- 4.4 The practice of cap and trade is a fraud for the following reasons: 34 35 36
- Cap and trade harms economies and reduces jobs by relying on a non-market-based political scheme to increase costs, so it is justly viewed as a tax on energy, the lifeblood of our economy.
- Cap and trade masks its negative consequences on the economy behind rhetorical benefits of new government programs designed to help, but a closer looks reveals that politicians find comfort in cap and trade because they can boast of reducing carbon emissions and hide behind its negative consequence that never appear as a tax on utility bills. Still the capping and trading produces no reduction in emissions because they are equivalent to no more than a tradable security on a stock exchange.
- Carbon permits force fuels and energy to become an arbitrary scarcity imposed by government fiat and consumers will be forced to restrict their use not because of supply but due to a number dreamed up by bureaucrats.
- Cap and trade masks the causes of higher consumer prices much better than a straightforward tax, the reason politicians love it.

<sup>&</sup>lt;sup>32</sup> Why Canadians are buying up U.S. utilities. https://www.forbes.com/sites/mergermarket/2016/02/25/why-canadians-are-winning-the-utility-deals/

<sup>&</sup>lt;sup>33</sup> http://www.crainsdetroit.com/article/20160312/NEWS01/160319964/heres-one-reason-canadians-are-snapping-up-u-s-utilities-like-novis

<sup>&</sup>lt;sup>34</sup> Economic impact of the Waxman-Markey cap and trade bill - http://scienceandpublicpolicy.org/commentaries-essays/commentaries/cap-and-trade-economic-impact

<sup>35</sup> Cap and Trade Institute for Energy Research - https://instituteforenergyresearch.org/topics/policy/cap-trade/

<sup>&</sup>lt;sup>36</sup> 5 reasons to oppose Ontario's cap and trade proposal December 11, 2015 by consumerpolicyinstitute https://ep.probeinternational.org/2015/12/11/5-reasons-to-oppose-ontarios-cap-and-trade-proposal/

- Cap and trade contains elements of centrally-planned Marxist economies. It transfers
  important economic decisions from private hands to government bureaus with an overall
  net loss of GDP, thus it subordinates to central planning.
- The main objective for cap and trade is to collapse industrial civilizations. The only demonstrated purpose is to accelerate the collapse says Myron Ebell of Competitive Enterprise Institute<sup>37</sup> and the same purpose verbalized by the U.N. Environment Programme<sup>38</sup>
- Cap and trade is susceptible to fraud and political manipulation, in particular it worsens the already "soaring" energy prices while playing a shell game with customers.
- Weakly regulated markets have begun to reveal their real identities: as Ponzi schemes<sup>39</sup>. True to its name, the California cap and trade market, like Europe's now-imploding market, and the market proposed in 2015 by Gov. Inslee is identical to the one that he intends to begin by executive order in Washington<sup>40</sup>. California's Gov. Brown had hopes to sell credits for \$600 million, but they garnered in a recent exchange auction only \$2.5 million anticipated, so the State is looking for other monies such as property taxes, income and sales taxes to make up the difference to fund projects promised in legislation.
- Economist Richard Bezdek and others argue that we must oppose cap and trade, to
  maintain use of fossil fuels for their massive social benefits and their enormous monetary
  benefits of emissions of carbon dioxide that also benefits plant and plant photosynthesis<sup>41</sup>
- Cap and trade won't reduce carbon emissions. This has already been proved in Europe
  whose cap and trade is more than a decade old and it has had no impact on emissions;
  worse, and Europe's cap and trade has been found to increase GHG emissions by 1.9% over
  a two year period, 2005-2007.
- Cap and trade is another form of corporate welfare. The feed-in tariff system of payments has been a bonanza for corporations at the expense of residential customers.
- The cap and trade is particularly susceptible to fraud and manipulation. Europol found that 90% of Europe's cap and trade carbon market was fraudulent and Interpol warned that intangibles in the form of carbon credits make them susceptible to corruption and it found that the UK was the only country that performed on-site inspections to ensure stated emissions were real.

http://www.unitypublishing.com/Government/Maurice%20Strong.htm

Maurice Strong, climate crook. https://quadrant.org.au/opinion/doomed-planet/2015/12/discovering-maurice-strong/

http://news.investors.com/ibd-editorials/021015-738779-climate-change-scare-tool-to-destroy-capitalism.htm

<sup>&</sup>lt;sup>37</sup> M. Ebell, 2009; alternativeenergy.procon.org

<sup>&</sup>lt;sup>38</sup> Maurice Strong, the father of America's destruction.

<sup>&</sup>lt;sup>39</sup> https://cpi.probeinternational.org/2016/06/01/california-dreamin-in-ontario/

<sup>40</sup> http://www.ecy.wa.gov/programs/air/permit\_register/Clean\_Air\_Rule/car.htm http://www.ecy.wa.gov/news/2016/118.html

<sup>&</sup>lt;sup>41</sup> Social benefits of carbon. Roger Bezdek http://marshall.org/climate-change/presentation-by-roger-bezdek-on-social- cost-of-carbon/

- Cap and trade makes soaring energy prices worse. Stressed customers were flocking to natural gas suppliers to relieve the pain of high prices but cap and trade will only worsens and ensures that any savings are wiped out.
- Soaring energy prices push households into fuel poverty and cap and trade ensures the trend continues. Ontario introduced a 10% rate reduction through the Clean Energy Benefit but the program was paid for by the same taxpayers who received the benefit. Then Ontario introduced the Energy Support Program funded by ratepayers which forces ratepayers to fund energy of low income households. Any cap and trade program will further increase energy costs and result in even more households struggling to pay energy bills.
- The point of cap and trade is to increase the price of electricity by 85% to the price that Pres. Obama believed would be on par with cost of renewables, so the price increases would be essential to ensure the success of cap and trade.
- Cap and trade harms the poor disproportionately more. A mere 15% forced reduction in emissions costs the lower-income households 3.3% of their incomes, but Pres. Obama wanted an 85% reduction and Ontario wants an 80% reduction, or levels which will invite much sacrifice from those who have the least to spare or already living on the "edge".
- Cap and trade harms energy security because it undermines and erodes the nation's energy backbone. Cap and trade will discourage domestic production and favor more expensive foreign imports which brings a concomitant loss of jobs, loss of tax base and loss of GDP. Cap and trade will assess heavy penalties on domestic oil, especially expensive oil from hydrofractured fields in the US and oil sands in Alberta.
- Cap and trade to intentionally reduce emissions also reduces use of fuels which also reduces GDP per capita. Energy is the lifeblood of the economy. The US currently has the highest GDP per capita due to our extraordinary large use of fuels.
- Use of cap and trade can only produce marginal impacts on climate. This is mainly because China is the largest emitter of GHG's. If Washington State completely ended all of its emissions of GHG's, that amount would be replaced in 35 days from other countries or 50 days from China alone. During 2000-2007 when the US emissions increased 2% the Chinese emissions increased 98%.
- A domestic cap and trade program in the US would force industries to leave America, with loss of jobs. The high price of natural gas is responsible for loss of 3 million jobs since 2000. Cap and trade would drive prices even higher.
- A suitable economic analysis and result of a cap and trade law is not available for the Ontario law, so the following describes the disaster of all disasters of its economic impact of the American Clean Energy and Security Act of 2009 in the U.S. that did not become law. The

text of this bill combines elements of cap and trade methods 1 and 2 outlined. Its economic impacts are described as follows:<sup>42</sup>

- As an energy tax in disguise, it's a very convoluted system of central planning whose chief purpose is to inflict economic pain on individuals and businesses.
- Only large energy users will pay the tax on CO2 but the costs will be camouflaged as costs added to inflate prices of consumer goods.
- Direct energy costs for a household of four starts at \$436 per year and grows to \$829 per year in 2035.
- Indirect energy costs begin at \$2979 per year and increase to \$4600 annually by 2035 so all energy, direct and indirect would cost a family of four \$5,429 / year.
- Additionally, electricity cost will increase by 90%, gasoline by 58% and natural gas by 55% with the cumulative cost on a family of four of \$20,000.
- Net job losses would be 1.14 million per year to 2035 after including the much-touted green jobs.
  - It reduces gross domestic product by nearly \$393 billion annually and \$9.4 trillion cumulatively to 2035 so the nation would be \$9.4 trillion poorer.
  - Farming and farm profits would be particularly hard hit since agriculture uses 58% more energy for fuel and fertilizer. Farm profits would plummet by 57% through 2035 which puts American farmers at a global disadvantage and likely many will quit or face bankruptcy. Food-related industries would exit the state.
  - In EPA's valuation of statistical life or mortality rate (VSL or VMR) studies, EPA values one statistical life in the range of \$50,000 up to \$10 million in lost income. The usual implied value is in terms GDP lost. Accordingly the \$393 billion (cited above) in annual lost income from the American Clean Energy and Security Act of 2009 translates to a minimum death rate of 39,300 deaths per year or minimum approaching 1 million deaths over the period 2012 to 2035. The rate would be much higher among the high risk group (i.e. young, elderly, infirmed, disadvantaged, and low income individuals) with value less than \$10 million.
  - Low and middle income taxpayers (the high risk group) would be particularly hardest hit according to EPA's VSL benchmarking;
  - Midwest and South would lose a substantial number of manufacturing jobs and rural America would be particularly hard hit compared to urban counterparts in the Northeast and West.
- 4.4 The *Green Energy Act* in Ontario, like Washington's *Energy Independence Act* (I-937) represent *grand social experiments* conducted population-wide on a whim, without forethought, without pilot testing, without scientific proof, or any proof of any sort, to satisfy a hasty policy—a policy that runs counter to best economic choices, a policy to reduce a substance proved to provide humongous monetary, human, and food producing benefit: *carbon dioxide*—with illusion of

<sup>&</sup>lt;sup>42</sup> The economic impact of the Waxman-Markey cap-and trade bill, by Ben Lieberman http://scienceandpublicpolicy.org/commentaries-essays/commentaries/cap-and-trade-economic-impact

reducing greenhouse emissions—falsely believed to bring a danger--that will never occur, with consequences known to be unprovable, but at extraordinary high cost while failing to consider enforced *human suffering for doing good*. Such rhetorical *goals* have for a decade proved themselves as hurried failed experiments in Europe, UK, Australia, and U.S.

#### Statement 5. Release information from the confidential protective order

A Protective Order exists to protect confidential information. This information needs to be disclosed to Avista customers who may be subject to or harmed by it.

Service Date: September 28, 2017

BEFORE THE WASHINGTON STATE UTILITIES AND TRANSPORTATION COMMISSION

*In the Matter of the Joint Application of* 

HYDRO ONE LIMITED (acting through its indirect subsidiary, Olympus Equity LLC) and AVISTA CORPORATION, for an Order Authorizing Proposed Transaction DOCKET UE-170970 ORDER 01 PROTECTIVE ORDER WITH "HIGHLY CONFIDENTIAL" PROVISIONS

The Washington Utilities and Transportation Commission (Commission) finds that a protective order to govern disclosure of proprietary and confidential information is necessary in this proceeding. The Commission provided the parties an opportunity to comment on the protective order, considered their comments, and finds as follows: It is likely that proprietary and confidential information will be required to resolve the issues in this proceeding.

- 1. Absent a protective order, a significant risk exists that confidential information might become available to persons who have no legitimate need for such information and that injury to the information provider or third parties could result.
- 2. In accordance with WAC 480-07-420(2), the Commission finds that it is necessary to create a separate designation and a higher degree of protection for certain documents asserted by parties to be highly confidential. This is consistent with the Commission's practice in prior cases involving contentions that certain documents require heightened protection to facilitate discovery, and is consistent with the requirements of WAC 480-07-423.

Accordingly, the Commission enters this Protective Order to govern the discovery and use of proprietary and confidential documents in this proceeding:

Statement 6. – The public should be made aware of information from hearings held in private.

Evidentiary hearings occurred on 5-22-18 and 5-23-18 which the public could not attend. The subject and the information and conclusions from hearings need to be disclosed to Avista customers who may be subject to or harmed by it. (calendar below)

## Washington Utilities and Transportation Commission

CONSUMERS - REGULATED INDUSTRIES - PUBLIC SAFETY -

Home > Documents and Proceedings > Commission Calendar - All Events

The commission is committed to providing reasonable accommodation to participants

### Commission Calendar

Start Date	Title		Category
5/22/2018 9:00 AM	Avista HydroOne Merger - Evidentiary Hearing	•••	Hearings
5/23/2018 9:00 AM	Avista HydroOne Merger - Evidentiary Hearing	•••	Hearings