



National Farmers Union

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Ontario Power Authority
120 Adelaide St. W., Suite 1600
Toronto, ON
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Attn: Ground-Mounted Solar PV

Dear Ontario Power Authority:

re. Ground-Mounted Solar PV Projects

We appreciate this opportunity to forward our comments and concerns about the proposed rate change for ground-mounted solar projects.

The National Farmers Union strongly supports the production of energy from renewable, sustainable sources as long as the production and distribution is under the control and ownership of farmers, rural communities and the broader public. We believe feed-in tariffs should be used in a way which maximizes the benefits to farmers and the citizens of Ontario.

Our members see the microFIT solar program as an ideal way for farmers to participate in the production of renewable energy, while at the same time helping to protect our environment. Most ground-mounted microFIT solar projects are controlled and owned by farmers, thus the benefits of the investment remain in the hands of farmers and rural communities.

The National Farmers Union is deeply concerned about the proposed rate change for ground mounted solar projects for many reasons, including the following:

- Farmers have jumped on board with ground-mounted units because in most cases they are a more practical way for farms to produce solar energy. Buildings already on the farm frequently are not appropriate for roof-mounted projects because they do not have the structural integrity for solar panels, do not have the correct orientation towards the sun or are shaded by trees around the homestead.

- We question OPA's opinion that ground-mounted solar is cheaper to install than roof-mounted solar. Ground-mounted systems have costs like excavating and concrete footings that are not required for roof-mounted systems.
- While OPA is committed to honouring the conditional offers and contracts that have already been signed, many of these applicants will not get the full return on their investment because of the impact of the proposed rate change. Farmers who have installed, or are in the process of installing, ground-mounted solar units will need ongoing maintenance and service to keep their units functioning to their full capacity throughout the twenty-year life of their contract. The proposed rate change is going to force many solar installation companies out of business, leaving farmers without the service and maintenance provided by their installation company.
- While buildings with roof-mounted panels on them can still be fully used for their intended purpose, on many farms ground-mounted units take some land out of production. This loss of production and the annoyance of having to drive equipment around the units, rather than in a straight line across the fields is not given consideration in your calculations.
- The proposed change in the rates so soon after implementing the microFIT program is quickly eroding the credibility of both the OPA and the Ontario Government among farmers and in rural communities.

The farmers and others who submitted the 10,700 applications presently in the queue with OPA submitted those applications in good faith. They believed they would be offered the same rate as the 2,300 contracts and conditional offers which are grandfathered under the .80 per kilowatt-hour rate. Many of those farmers have already invested significant amounts of time and money in their planned ground-mounted solar projects and some have already paid for inspections by Hydro One.

Even if all 16,000 applications for small ground-mounted and roof-mounted solar units end up producing electricity they will contribute a miniscule amount of electricity, by some estimates less than one-tenth of one percent of the total electricity consumed in Ontario. It is hard to fathom that the cost of maintaining the present rate for ground-mounted solar is simply too great for the electricity users in Ontario. Since these small units are owned and controlled by farmers, landowners and homeowners, the financial benefits will stay in our communities to the benefit of the people of Ontario. This is quite different than the money being paid to large scale industrial solar and wind projects owned and controlled by corporations from outside the province. In these cases energy consumers will also pay higher rates, albeit lower than for microFit projects, but the financial benefits will leave the province.

The National Farmers Union makes the following recommendations to the Ontario Power Authority:

1. Keep the same rate for ground-mounted and roof-mounted solar units under 10kW until at least the 2011 review of the microFIT program.
2. If OPA remains committed to lowering the rate, then all 16,000 applications already submitted for microFIT projects, including the 10,700 in the queue without contracts or conditional offers, must be grandfathered under the present rate of .80/kwh.

Farmers are feeling completely blind-sided by this proposed rate change, so soon after the implementioan of the microFIT program. The credibility of the OPA, the Ontario Government and the Green Energy Act will continue to plummet in the eyes of farmers and rural communities if the OPA follows through with the proposed rate change for ground-mounted solar projects.

We trust you will give our comments and recommendations serious consideration, along with the many other comments your receive through this consultation process.

Sincerely,



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c.c. Hon. Brad Duguid, Minister of Energy and Infrastructure
c.ci. Premier Dalton McGuinty