

IN THE MATTER OF a process initiated by the Ontario Energy Board to review the regulatory process for the consideration of the Integrated Power System Plan of the Ontario Power Authority.

**SUBMISSIONS ON STAFF DISCUSSION PAPER
FROM THE ENERGY PROBE RESEARCH FOUNDATION**

As a general observation, Energy Probe believes that the Staff discussion paper on the IPSP review provides a workable approach consistent with the scope of review directed by the Ontario government. Our analysis of the discussion paper has not identified any elements that we would recommend removing. We do have several suggestions for expanding the scope of the examination.

The filing requirements might include an explicit direction to the Ontario Power Authority (OPA) to provide an analysis of the existing generation and transmission systems in sufficient detail to provide a baseline to support the OPA's planned expansion.

With all its proposed conservation programs and power generation programs, the OPA should be encouraged to benchmark the forecasted performance against the best available comparators that are actually implemented.

The Staff report anticipates that the OPA will provide the Board with periodic updates regarding the IPSP implementation between triennial reviews, a proposition that Energy Probe endorses. We suggest that the updates should be scheduled in advance – we suggest an update at least once every six months – and that updates should be published publicly.

With regard to generation resources, Staff has proposed a useful list of forecasts that the OPA must provide with respect to each generation resource (p. 16-17). We suggest augmenting this list with requirements that the following performance characteristics be included: an analysis of dispatchability issues for each form of generation, the life expectancy, and the capacity factor forecast over time.

With respect to environmental issues, for all fossil generation options proposed, the life-cycle emissions per unit output should be estimated, including all assumptions underpinning the estimate.

The rate implications of the proposed plan should be presented in detail, including an annual breakdown of the costs anticipated for future years.

Respectfully submitted at Toronto, Ontario this 4th day of October, 2006,

**Tom Adams
Executive Director
Energy Probe**