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ONTARIO ENERGY BOARD

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Nov. 20, 2007.

Response to: EB-2007-0707 Notice of Phase 1. Dated Oct. 22, 2007.  
Development of Issues List for Application  
for approval of the Integrated Power System Plan  
and Procurement Processes. Letter of Comment.

Background.

I do not have a computer. And I have not seen the 7-binder, 7000 page collection of material supporting the application.

The OPA information number said that the seven binders would be available in Walkerton at 30 Park St. That is the Bruce Co. administration building. The Bruce Co. Clerk's office did not have the material in print. But it did have one CD and a copy of OPA's proposed issues list which it had received Nov. 15. I obtained a copy of the issues list yesterday from the Clerk.

I live in the former Brant Twp. in the Municipality of Brockton, about 25 miles southeast of the Bruce Power Complex. Transmission lines currently cross some family farm property. In the past, plans for new transmission out of Bruce have threatened what is now my property.

The following Issues suggestions sometimes refer to OPA's Discussion Paper 7: Integrating the Elements — a Preliminary Plan. dated Nov. 15, 2006. I do not know its exhibit no.

Issues suggesstions.

1. Was the use of a more local generation system, with supply matched to demand, considered in preference to reliance on the Bulk Electrical System which takes electricity from distant nuclear units at Bruce to large load centres such as Toronto?  
I'm not suggesting the large transmission lines be torn down.  
I am suggesting the system move away from such reliance on them.
2. Re: location of new nuclear plants.  
Why are such large developments "possible only at a limited number of sites" (OPA Discussion Paper 7. p. 65) ?  
Why not build them in Toronto and the GTA where the need is, thus reducing the need for transmission?

3. Re: Use of existing sites for nuclear generation.

Why does consideration have to be limited to Darlington and Bruce? I do not support building any **new generation** at Bruce. If an existing site has to be used for new nuclear generation, I would suggest also looking at other existing sites, such as Lakeview which is in the area of need.

4. Re: Characteristics of nuclear generation.

Considering that some of Ontario's nuclear reactors have been out of service for **years**, it is difficult to think of them as reliable. At this point it is not certain that refurbished **and/** or new reactors would be more reliable in the long run than they have been in the past.

Nuclear units have been inflexible.

Nuclear energy is produced in large blocks of power, such that when a reactor shuts down, large blocks of power are lost to the **system**.

Whether nuclear generation produces clean energy is debatable.

5. Re: Transmission.

Could installing different **types** of conductors on present rights-of-way provide better **delivery** and **security** to the present **system**, thus reducing the need for new transmission? Could such technology limit needs in the future.

6. Re: Transmission integration requirement for conventional generation.

OPA Discussion Paper 7, p.65, states that "whatever decision is made on conventional generation, there will be a transmission integration requirement."

This could lead to an **unnecessary** overbuilding of the transmission **system**.

Will there be a stipulation that transmission integration will not automatically trigger approval of a new right-of-way or line; and that the existing **system**, or existing **system** plus modifications, will be examined to see whether it can carry the new output?

7. Exports.

Is the IPSP looking towards the export of nuclear power?

8. Re: Costs of Transmission.

a) On p. 65 and 66 of OPA's Discussion Paper 7, the following statements are made regarding integrating conventional resources such as nuclear power:

the transmission system for incorporating baseload plants must have adequate delivery capacity available to these plants at all times

system security is an important consideration for incorporating these resources, especially major resources that meet an appreciable portion of total demand. Where possible, there should be alternate paths for delivering power to customers from such resources

In practice, this could also be applied to incorporating resources such as wind generation.

One implication of the p. 65 and 66 statements is an out-of-control expansion of the transmission system.

b) In the course of moving electricity from one area to another, transmission is used to compensate for gross deficiencies in the characteristics of different types of generation.

For instance, in the case of nuclear generation, the industry has not been able to persuade the large electricity users, such as cities, to accept siting of new reactors.

The energy is not flexible; and its reliability is questionable. The electricity is produced in large blocks of power, such that when a reactor is down, a large block of power is lost to the system.

In the case of wind projects, they don't provide reliable electricity. And siting wind generation depends on where the wind resources are sufficient, not on where the need for electricity is.

So transmission provides a huge benefit to both the users of electricity and to the owners of generation. Those who have transmission thrust on their environment, and who put up with the adverse impacts of transmission lines, provide a benefit not only to electricity users but also to electricity producers.

In view of the above, it would not be fitting for people

affected by transmission to be denied extra mitigation and compensation.

In view of what electricity users and producers are getting from transmission, someone has suggested that directly affected landowners be paid a substantial royalty in perpetuity on all electricity flowing through the lines over their property, over and above mitigation and compensation.

Thank-you for the opportunity to make these comments.  
Unfolding developments might give rise to other concerns.

Respectfully submitted,

*Florence Mackesy*

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