



Ontario Energy Board
Commission de l'énergie de l'Ontario

Integrated Power System Plan (IPSP) Proceeding

Comment on Ontario Power Authority Issues List

[Read the OPA Proposed Issues List](#)

[<< Back to the IPSP webpage](#)

Please note that fields marked with an asterisk (*) are denoted as mandatory

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1 Does the list capture what you feel needs to be reviewed by the Ontario Energy Board?
 Comments:

The Toronto Board of Trade is Canada's largest local board of trade/chamber of commerce. Our members are comprised of businesses of all sizes, publicly-traded and privately held, from every sector located in Toronto and across the GTA. We are the voice of the business community for Toronto.

- Businesses in Toronto and the GTA need a reliable supply of power at reasonable prices. We are concerned that the security of supply to downtown Toronto and the financial district is not identified separately in the issues list. In view of the current 'high impact event' dangers posed by the current inadequacy of electrical transmission to Central Toronto, the "Transmission Solution Project Schedule [IPSP Exhibit E Section 5.3.5]" , which provides for a third transmission supply path to be in service no earlier than 2016, needs to be specifically reviewed.

- We would also like to emphasize the importance of electricity pricing to the competitiveness of Ontario's businesses—many of which are located in Toronto and the GTA—and the economic growth of the province. The cost assumptions which lead to the pricing tables in the IPSP have not been made available and are not transparent. The cost of carbon has not been considered in the pricing calculations.

2 Is there anything you feel needs to be **added** to the proposed Issues List?

Comments:

- Transmission and supply considerations that address the security of supply issues facing the City of Toronto.
- A review of the cost assumptions used within the IPSP to determine the annual commodity price tables.
- The impact of the cost of carbon resulting from federal and provincial Climate Change action plans
 - Re: Part 1, OPA's Issue (1).1 (*"Does the IPSP define programs and actions which aim to reduce projected peak demand by 1,350 MW by 2010, and by an additional 3,600 MW by 2025?"*) – Are the CDM programs and funding sufficiently available and open to all energy services providers to ensure that the allocation and assignment of work and funds is done competitively in a transparent and cost effective manner?
 - Re: Part II - Issue 1 (*"Part II addresses the effect of OEB approval. The legal effect of an approved IPSP is two fold: first, it provides direction for subsequent regulatory decisions to be made by the OEB; second, it triggers the authority of the OPA to commence procurement processes without Ministerial direction. With respect to subsequent OEB decisions, the Board's mandate to facilitate the implementation of an approved IPSP can be operational zed through licence conditions, approvals for rates and facilities, and review of policy approaches towards such things as load serving entities, allocating costs for transmission connections, and Conservation."*) <EB-2007-0707 Exhibit A Tab 2 Schedule 2 Page 3 of 22> --What is the appropriate approval process for the OPA policy approaches towards such things as load serving entities, allocating costs for transmission connections, and Conservation, etc.
 - Re: Part II, Issue 2 (*"There are three forms of procurement process that can be anticipated to be used by the OPA – competitive processes (i.e., open tenders), non-competitive processes (i.e., single source procurement) and standard offer processes. Competitive processes may be addressed to the public generally, to all persons within a*

particular class (i.e., to all licensed distributors or to all licensed generators) or to a list of pre-identified prospective proponents having known qualifications. Non-competitive processes are those in which formal competitive processes are not used to select among bids. Standard offer processes are those for which standard contract terms and conditions are made available to all interested and qualified proponents with technically feasible projects, subject to any ceiling or cap that may be in place." <EB-2007-0707, Exhibit A-3-1, Page 35 of 48>

-- How do the three forms of procurement process as anticipated to be used by the OPA facilitate the development of a competitive market and price transparency in order to reduce reliance on central (OPA) procurement?

- 3 Is there anything you feel needs to be **deleted** from the proposed Issues List?

Server Error in '/IPSP_survey' Application.

A potentially dangerous Request.Form value was detected from the client (QuestionsDL\$ctl01\$commentsTxt="...rvation." <EB-2007-0707 Exhibi...").

Description: Request Validation has detected a potentially dangerous client input value, and processing of the request has been aborted. This value may indicate an attempt to compromise the security of your application, such as a cross-site scripting attack. You can disable request validation by setting `validateRequest=false` in the `Page` directive or in the configuration section. However, it is strongly recommended that your application explicitly check all inputs in this case.

Exception Details: System.Web.HttpRequestValidationException: A potentially dangerous Request Form value was detected from the client (QuestionsDL\$ctl01\$commentsTxt="...rvation." <EB-2007-0707 Exhibi...").

Source Error:

[No relevant source lines]

Source File: c:\WINDOWS\Microsoft.NET\Framework\v2.0.50727\Temporary ASP.NET Files\ipsp_survey\426a3162\9a75a0b2fApp_Web_objects\4.cs Line: 0

Stack Trace:

```
[HttpRequestValidationException (0x80004005): A potentially dangerous Request.Form value was detected from the client (QuestionsDL$ctl01$commentsTxt="...rvation." <EB-2007-0707 Exhibi...").]
System.Web.HttpRequest.ValidateString(String s, String valueName, String collectionName) +3308446
System.Web.HttpRequest.ValidateNameValueCollection(NameValueCollection nvc, String collectionName) +108
System.Web.HttpRequest.get_Form() +119
System.Web.HttpRequest.get_HasForm() +57
System.Web.UI.Page.GetCollectionBasedOnMethod(Boolean dontReturnNull) +2070529
System.Web.UI.Page.DeterminePostBackMode() +63
System.Web.UI.Page.ProcessRequestMain(Boolean includeStagesBeforeAsyncPoint, Boolean includeStagesAfterAsyncPoint) +6978
System.Web.UI.Page.ProcessRequest(Boolean includeStagesBeforeAsyncPoint, Boolean includeStagesAfterAsyncPoint) +213
System.Web.UI.Page.ProcessRequest() +86
System.Web.UI.Page.ProcessRequestWithNoAssert(HttpContext context) +18
System.Web.UI.Page.ProcessRequest(HttpContext context) +49
ASP.ipsp_aspx.ProcessRequest(HttpContext context) in c:\WINDOWS\Microsoft.NET\Framework\v2.0.50727\Temporary ASP.NET Files\ipsp_survey\426a3162\9a75a0b2fApp_Web_objects\4.cs:303
System.Web.CallHandlerExecutionStep.System.Web.HttpApplication.IExecutionStep.Execute() +303
System.Web.HttpApplication.ExecuteStep(IExecutionStep step, Boolean& completedSynchronously) +64
```

Version Information: Microsoft .NET Framework Version 2.0.50727.832; ASP.NET Version 2.0.50727.832



The Toronto Board of Trade

FAX

45

To:	Kirsten Walli Board Secretary	From:	Tracy Hodder
Company:	Ontario Energy Board		
Phone:		Phone:	416 862 4516
Fax:	416 440 7656	Fax:	416-366-6460
Date:	December 13, 2007		
Re:	Attached Submission		
Pages:	, including cover		

Ms. Walli

[Handwritten signature] 14/12/07

We were processing this submission on the web site,
http://www.errr.oeb.gov.on.ca/ipsp_survey/ipsp.aspx.

While we did see a small box confirming submission, it was followed by an error page.
This error page is also attached.

In the interest of ensuring OEB receives Toronto Board of Trade's comment on
Integrated Power System Plan Proceeding, we are sending this fax.

Thank you,

Tracy