



Canadian Wind Energy Association
Association canadienne de l'énergie éolienne

December 13, 2007

Ms. Kristen Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto, Ontario M4P 1E4

Dear Ms. Walli,

The Canadian Wind Energy Association (CanWEA) is pleased to provide the following comments in response to OPA's draft Issues List for the review of the Integrated Power System Plan (IPSP). CanWEA is the national industry association for Canada's wind energy industry and represents more than 330 companies including wind turbine and component manufacturers, wind energy project developers, and service providers to the wind energy industry.

Issues proposed by CanWEA

I. Transmission Planning

Does the plan adequately address the schedule for implementing renewable supply in light of lead times for supply and transmission?

Rationale: While the IPSP does a thorough job of describing 'what' should be done in terms of new transmission investment, it is silent on 'how'. The IPSP must do more to define how new investments in transmission will be procured and funded in a timely manner.

While the IPSP does consider the lead times for permitting and approvals on new transmission, a schedule is required for initiation of permitting applications, etc for upgraded or enabling lines in the 2008-2010 period, other than on the Bruce-Milton project. Transmission upgrades should be scheduled now, to be in-service and allow new supply resource to come on-line in the timeframe outlined in the plan.

Given the tight timelines for many of the transmission initiatives discussed, the 'how' and 'when' needs to be defined, understood and acted as soon as possible. Accordingly, routing, siting and permitting work on some of the key transmission initiatives proposed in the Plan should commence in the 2008-2010 period to account for long lead times that will be required for these

initiatives to be completed. Therefore, there needs to be some consideration of the 'how' in this review by the Board.

2. Procurement

Has the OPA provided enough detail in its procurement plans to inform procurement decisions and process throughout the life of the Plan?

Does the Plan provide flexibility in procurement schedules in light of lead times for certain technologies?

Rationale: The OPA's procurement plan is offered only at a very high level. The plans should specify how procurements will be made for all resources and provide more certainty as to timing, targets and in-service dates for new supply.

The IPSP's procurement targets provides a schedule for bringing new supply on-line in Stage 1 (2010-2015), Stage 2 (2016-2019) and Stage 3 (2020 and beyond). It is important to consider that certain types of generation, especially wind, can be brought on-line quickly and in a modular fashion at competitive prices. Accordingly, the OPA should provide opportunities that may exist to bring this generation on-line more rapidly. This approach will also provide greater flexibility in managing efforts to bring on-line other generation technologies that have longer lead times.

3. IPSP Review

Does the Plan provide for future review of supply targets and procurement schedules based on costs, performance and technological development?

Rationale: The Plan should provide flexibility for future reviews to react to realities in terms of implementation schedules of certain technologies and initiatives, cost effectiveness, and evolution of technology. The current plan constrains the contribution of certain technologies and initiatives due to the current assumptions of cost effectiveness, performance and risk. There needs to be flexibility to revisit some of these assumptions in future reviews of the Plan based on future realities of economic prudence and cost effectiveness. These realities need to be considered in future reviews and there needs to be flexibility in the Plan to compensate for these.

Thank you for your consideration.

Sincerely,



David Timm
Ontario Policy Manager