



WEILER, MALONEY, NELSON

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January 11, 2008

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File #54340

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Ontario Energy Board
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*John A. Cyr
Corporate Commercial Law Specialist**

Attention: Ms. Kirsten Walli, Board Secretary

Brian A. Babcock

Dear Ms. Walli:

*Garth A. O'Neill
Labour Law Specialist**

**Re: IPSP Issues Proceeding EB2007-0707
City of Thunder Bay et al
Intervenor Submission**

Deborah A. Humphreys

As you are aware, I will be heading the joint Submission for three of the Intervenors:

Bradley A. Smith

~ the Northwestern Ontario Municipal Association (NOMA),

Stedley Trevis

~ the City of Thunder Bay, and

Lydia C. Storn

~ the Township of Atikokan.

Nick Melchiarre

Dorian N. Persaud

Each of The City and NOMA has filed a list of issues. None of the Intervenors has filed evidence.

Mura A. Pottinger

Background

It will be helpful if the Board Members have an explanation as to why these Intervenors are only now becoming involved.

**Certified by the Law Society of Upper
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Because of their known interests, all three Intervenor, particularly NOMA, had assumed they would be specifically canvassed in any consultation process undertaken by the Ontario Power Authority that affected northwestern Ontario. Unfortunately, none of the Intervenor adverted to the published Notice in the Thunder Bay Chronicle-Journal in July, 2006.

Having now had an opportunity to consider the specific proposals set out in this IPSP each of the Intervenor sees as imperative the need to become involved in the Board's review.

As a related point, my retainer in this matter by the City of Thunder Bay, did not begin until December 17, 2007. The learning curve has obviously been steep and explains why I am writing this to you now rather than a month ago. That said, we will be certainly be ready for submissions on the issues matter at the scheduled time on the afternoon of Wednesday January 16, 2008. The Board's accommodation on our requested time is appreciated. In addition to brief comments by each of Mayor Dennis Brown on behalf of the Township of Atikokan and Mayor Anne Krassilowsky, President of NOMA, a portion of the main Submission will be delivered by Mr. Rod Bosch, a volunteer member of the NOMA Energy Task Force.

Issues

Firstly, the Intervenor are concerned that the IPSP has not addressed the inherent insecurity in supply of electricity by means of three very long radial transmission lines into the region. Secondly, the Intervenor are concerned about instability throughout the northwestern Ontario system that would arise with removal of the two thermal generators from the northwestern Ontario portion of the grid.

The concerns related to radial transmission lines arises from the failure of the IPSP to address the need for looping of the long radial circuits for purposes of needed security of supply. The present lack of security in the transmission system if not remedied will simply remain a significant disincentive firstly, to development of resource based industries throughout northwestern Ontario and secondly, to the enhancement of the supply of electricity to First Nation communities now depending on diesel fuel generators. The looping of those radial lines must become an issue in Phase II.

The concerns related to the withdrawal of the two thermal generators are:

1. the instability that would be caused if the inertial effect of the three large turbines in the two thermal generating stations were to be withdrawn from the northwestern Ontario grid without compensating for the stability the turbines provide in the system; and



2. the insecurity that would arise in attempting replacement of resultant loss in megawatts of thermal generating capacity with the available megawatts of transmission supply.

Changes to the northwestern Ontario system that cannot maintain required inertia and cannot maintain sufficient energy to meet base load needs must also become issues for the Board in Phase II.

These issues subsume those already listed and filed individually by these Intervenor.

The Intervenor consider insecurity and instability that the IPSP would create for northwestern Ontario to be so fundamental and pervasive, and so inconsistent with the requirements of the Electricity Act, that the Intervenor will seek to have those portions of the IPSP that affect northwestern Ontario referred back to the Ontario Power Authority for development of a new Plan, one that will ensure that northwestern Ontario has a supply of electricity that is adequate, safe, sustainable and reliable over the next 20 years.

Yours very truly,

WEILER, MALONEY, NELSON

Per:

John A. Cyr

JAC/dl

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Att: Mr. George Vegh