

## **Northwatch Issues List**

This submission is made on behalf of Northwatch, a regional coalition of environmental and social organizations in northeastern Ontario. Northwatch has a long term and consistent interest in electricity planning in Ontario. In particular, our interests are with respect to electricity generation and transmission in northeastern Ontario, conservation and efficiency measures, and rates and rate structures.

Our interests in the Integrated Power Supply Plan, as developed by the Ontario Power Authority, focus on a few key areas:

- ❖ Conservation and efficiency measures, and their ability to replace demand for new supply
- ❖ Generation projects proposed for northern Ontario, including and particularly new hydro-developments and biomass projects
- ❖ Transmission system expansions and upgrades, including and particularly proposed additions to the system that would be sited in northern Ontario but not be designed to serve northern Ontario
- ❖ Nuclear extensions and expansions, including and particularly their potential impacts on northern Ontario, such as expanded uranium refining operations, increased transport of nuclear products, expanded mineral exploration, eventual efforts to site a nuclear waste repository, potential for catastrophic accidents, and overall cost implications

These interests can best be addressed through a planning approach which relies on demand/supply planning which takes a regional approach, and is based on sustainability.

Our concern is the extent that the Board considers the impact of the proposed IPSP on sustainability, the environment, and regional equity in northern Ontario and on communities in the northern Ontario.

### **Priority on Conservation**

1. Has the OPA been innovative in its strategies to accelerate the implementation of conservation, energy efficiency and demand management measures?
2. How does the OPA's sequencing the installation of resources affect their selection of resources in general, and in particular their selection of supply resources versus conservation resources?

*From Northwatch's perspective, each kilowatt of failure to conserve electricity in southern Ontario will result in a kilowatt's equivalent environmental burden from electricity generation and transmission projects in northern Ontario.*

## **Transmission Development**

3. Does the OPA identify clearly enough the approval that it is seeking? ie does the OPA differentiate clearly enough between what is in its 20 year plan and what it will undertake between now and 2010?
4. What direction should the OPA follow in its transmission development work in the near term? For example, has the OPA made it their priority to use existing and avoid new transmission corridors wherever possible? Has the OPA adequately incorporated design flexibility into their approach to transmission planning?

*From Northwatch's perspective, building new transmission lines when existing transmission could be used, or building transmission lines that are incapable of distributing energy in the north as part of a distributed grid would cause unjustified environmental impact in, and a lack of benefits to, northern Ontario.*

## **Impacts on the Natural Environment**

5. Have environmental protection and environmental sustainability been adequately considered in developing the plan?
6. For each proposed electricity project, has the OPA:
  - described the environment that might be affected, directly and/or indirectly?
  - Described the likely environmental effects of the electricity project?
  - Described what mitigation measures might be required?
  - Identified a reasonable range of alternatives, described those alternatives, and compared them to the proposed project?

*The majority of new projects identified in the Ontario Power Authority's Integrated Power Supply Plan are sited in northern Ontario, each with attendant environmental impacts. The electricity use - and majority of the benefits of the electricity use - will be in the south. From a northern Ontario perspective, it is imperative that each project be given a full examination, including need, environmental effects, mitigating measures, and alternatives. The environmental burden that the North is being expected to bear should not be made heavier by inadequate consideration of the environmental effects or by the absence of an appropriate weighing of those effects in the decision-making process.*

## **Procurement**

7. Will the OPA's proposed approach of Non-competitive Procurements meet the test set out in Reg 426/04 of being "fair and clearly stated and, wherever possible, open and accessible to a broad range of interested bidders"?

*Processes with less transparency often have disproportionately negative impacts on more marginalized regions, communities, or peoples, such as the region of northern Ontario.*

## **Application of the TRC Test**

8. How is the OPA's application of a Total Resource Cost ("TRC") Test consistent with sustainability criteria?

*The OPA has been directed to adopt an approach based of sustainable development, including environmental sustainability. In contrast, the OPA's Total Resource Cost appears to be unduly weighted to economic costs.*

## **Forest Biomass**

9. How has the OPA calculated the potential for biomass in each of the three identified regions?

*The OPA has adopted a broad definition of forest biomass to include standing forests and – potentially – new plantations. By the OPA's own admission, there is a high level of uncertainty in the field. Yet the OPA has put forward numbers which, if acted upon, could have widespread economic, social and environmental consequences for the forests and the forest-dependent communities of northern Ontario, which is identified as the source of wood biomass.*

## **Social and Economic Impact**

10. Given that the definition of Environment includes “social, economic and cultural conditions that influence the life of man or a community”, how has the OPA incorporated:

a) issues of social equity into its Integrated Power Supply Plan, particularly in terms of equity between regional populations?

a) regionally balanced demand/supply planning into its Integrated Power Supply Plan?

*From Northwatch’s perspective making conservation a significant priority, sequencing transmission use in favour of existing transmission lines, designing the transmission system to prioritize local and regional needs/use, and responsibly assessing the environmental impacts of related projects are essential elements of electricity planning.*

*Applying these elements may be a way to balance demand/supply planning so that northern Ontario does not bear more of a burden in terms of social and environmental impact than is necessary to implement the IPSP.*