

From: [BoardSec](#)
To: [Shelly-Anne Connell](#)
Subject: FW: EB-2010-0220
Date: October 1, 2010 1:57:40 PM
Attachments: [Intervenor Letter re OPA.odt](#)
[OPA Intevenor letter.wps](#)

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From: [REDACTED]
Sent: October 1, 2010 1:56 PM
To: BoardSec
Cc: miriam.heinz@powerauthority.on.ca; caroline.jageman@powerauthority.on.ca
Subject: EB-2010-0220

Dear Ms. Walli: The letter below, and attached in "OpenOffice.org Writer" and "Microsoft Works Word Processor" outlines my request to represent myself (a ratepayer) in the captioned matter and outlines the reasons for the intevenor status requested. My apologies for being unable to submit the letter in word or PDF format but I assume the OEB will not find it difficult to redact my personal information (for public consumption) and put it in PDF format. I have mailed two copies of the letter by regular post.

Yours truly,

Parker Gallant

Letter follows hereunder:

October 1, 2010

Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto ON M4P 1E4
Attention: Board Secretary
Tel: 1-877-632-2727 (toll free)
Fax: 416-440-7656
E-mail: Boardsec@oeb.gov.on.ca

re. EB-2010-0220 (OPA Application to Amend License)

Dear Ms. Walli,

Please bring to the attention of the Board this notice of intervention which includes my objection to the decision of the Board to proceed with the above noted matter by way of a written hearing.

On August 30, 2010, the Ontario Power Authority (OPA) flagrantly and without notice, much less explanation, breached Ontario law and the OEB license under which the OPA operates when it failed to update its Integrated Power System Plan (IPSP). The OPA filed its first Integrated Power System Plan (IPSP) with the OEB on August 29, 2007, although that plan never received approval from the Board.

The Electricity Act section 25.30 requires that the OPA produce an update of the IPSP as frequently as required by regulation. Ontario Regulation 424/04 stipulates an interval of not more than 3 years between iterations of that plan. The OEB's current license for the OPA in Section 10.1 matches the timing requirements of regulation.

The institutional structure of Ontario's electricity sector revolves around central planning. This central planning based system is operating without a plan, a deficiency that greatly increases financial risks to ratepayers and may well imperil Ontario's power system reliability impacting the creation of jobs and the ability of the Province to maintain its obligations to the ratepayers and taxpayers.

The OPA's breach of its statutory and license responsibilities creates a major transparency and accountability gap in Ontario's power system. Without an updated IPSP, there is no way for the public to accurately assess the prudence of OPA generation procurement and transmission planning practices, the outlook for ratepayer electricity costs associated with generation and conservation programs, the measures the OPA is taking to protect consumers from fraudulent claims by generators, or the appropriateness of measures the OPA is taking to ensure power system reliability.

The OPA's prefiled evidence provides no explanation for its flagrant breach of its OEB license.

The OPA has assured the public since it withdrew its 2007 IPSP that it has been continuing to perform system planning. For example in its 2009 Annual Report we find the following assurance:

"The OPA's operations also increased in complexity in 2009. This was reflected in the significant increase in the number and value of electricity contracts we managed, as well as in the increased emphasis on a dynamic and flexible approach to system planning."

With this and many similar statements, it is apparent that the OPA sought to assure the public that it was acting in compliance with its responsibilities and its license.

The following four reasons demonstrate why a public hearing is required to ensure that the public record is complete with respect to the OPA's breach.

1. A witness from the Ontario Energy Board with appropriate authority for licensing must be called to explain the steps the Board has taken to enforce its license for the OPA.
2. The OPA must respond to cross examination to explain its reasons for flagrantly and without notice breaching its license.
3. The OPA must explain its long record of public statements indicating that it was developing an IPSP update.
4. The OPA must respond to new evidence that I intend to adduce raising pressing technical questions about the analysis upon which the OPA's claimed that key elements of the original IPSP renewable energy expansion forecast would not impair the reliability of Ontario's power system.

Sincerely,

A. Parker Gallant,
[REDACTED]

NB: Please redact my personal information (address, phone, etc.) when you post this to your website.

Phone: [REDACTED]

Phone: [REDACTED]

e-mail: [REDACTED]

cc: Ontario Power Authority
120 Adelaide Street West, Suite 1600
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Attention: Miriam Heinz
E-mail: Miriam.Heinz@powerauthority.on.ca

cc: Applicant's Counsel
Ontario Power Authority
Attention: Caroline Jageman
E-mail: Caroline.Jageman@powerauthority.on.ca

Reduce Your Carbon Footprint, Please Think Before You Print.