

**Weiler, Maloney, Nelson**

**EB-2011-0140 East West Tie Designation Proceeding**

**NOACC - NOMA Intervenors**

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Legal Counsel

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**NOACC-NOMA Intervenors**

- The Northwestern Ontario Associated Chambers of Commerce (NOACC)
- The Northwestern Ontario Municipal Association (NOMA)
- The City of Thunder Bay

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**Nature of Submissions**

– The NOACC-Coalition Intervenors:

- have no position as to which of the applicants should be chosen as the designated transmitter to carry out development work for the East-West Tie Line.
- Are making these submission to the Board to assist the Board in determining an appropriate assessment methodology to be applied to the decision criteria and to propose weights or relative importance to be assigned to the decision criteria.

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**Reliability: NERC Standards**

Reliability = Adequacy + Security

- Reliability – the ability to meet the electrical needs of end-use customers, even when unexpected equipment failures or other factors reduce the amount of available electricity.
  - Adequacy – The ability of the bulk power system to supply the aggregate electrical demand and energy requirements of the customers at all times, taking into account scheduled and reasonably expected unscheduled outages of system elements
  - Security – The ability of the bulk power system to withstand sudden disturbances such as electric short circuits or unanticipated loss of system elements from credible contingencies.

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**Importance of Reliability in the Northwest Region**

- Examples:
  - Goldcorp 37 Hour Power Outage
  - Pulp and Paper

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### Decision Criteria – Reliability of Design

- NOACC-NOMA Intervenors Submit that:
  - Reliability should be given a favourable weighting, or alternatively, be afforded a high level of importance in relation to other Decision Criteria

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### Decision Criteria – Reliability of Design

- We are not power system design specialists but assume that the IESO and OPA analysis is accurate on the event of a permanent line fault on a new circuit.
- The IESO feasibility study and the OPA’s Outlook support, a double-circuit line as preferable, based on Reliability, when compared to a single-circuit option.

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### Decision Criteria – Reliability of Design

- While double-circuit design offers an enhanced level of security, it does so if the event is a fault in only one of the circuits or transmission suppression in only one of the circuits.
- The underlying question, however, is whether the likely causes of a line fault, or transmission suppression, are likely to affect only one of the suggested double-circuits or both of them.

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### Decision Criteria – Reliability of Design

- The NOACC-NOMA Intervenors ask that the Board consider, the assumptions underlying the IESO and OPA analyses.
- Consideration needs to be given to the foreseeable causes of permanent line faults in the East West Tie.
- Consideration also needs to be given to the foreseeable causes of transient effects such as suppression of transmission during electrical storms.

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### Decision Criteria - Schedule

- Schedule in relation to the in-service date of the EWT upgrade is of critical importance.
- Correspondingly, the capacity of the transmitter to be designated to design and construct the EWT expansion within the proposed schedule must be given favourable weighting, or alternatively, a high level of importance.
- appears to be both a foreseeable lack of reliability and a foreseeable lack of robustness in what appears to be the power system plan for the Northwest Region

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### Decision Criteria - Schedule

- Minister of Energy Directive to the OPA dated February 17, 2011 stated:
  - “The Government’s commitment to replace all coal-fired generation by the end of 2014 will be met”

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### Decision Criteria - Schedule

- Minister of Energy Directive to the OPA dated August 17, 2011 stated:
  - “Ontario’s Long Term Energy Plan, released in November 2010, proposed converting two coal-fired units at the Ontario Power Generation (“OPG”) Thunder Bay Generating Station to natural gas. These converted units are needed **not only for the local supply to the city of Thunder Bay, but also for system reliability in northwestern Ontario**. Given the nature of the conversion, the Ministry of Energy recognizes the OPG’s requirement for a long term energy supply contract in respect of the output from these units. As such, the Ministry has determined to pursue the initiative of negotiating and concluding such an Agreement.”

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### Decision Criteria - Schedule

- NERC Standards: Reliability = Adequacy + Security:
  - Adequacy - The ability of the bulk power system to supply the aggregate electrical demand and energy requirements of the customers at all times, taking into account scheduled and reasonably expected unscheduled outages of system elements.

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### Decision Criteria - Schedule

- The interim between January 1, 2015 and the commissioning of the EWT will leave the power supply system for the Northwest Region in unacceptable jeopardy.
- We anticipate that this jeopardy will arise because the need of enhanced power supply for the development of the mining sector that is forecasted to mature before the in-service date of the expanded East-West Tie.

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### Decision Criteria - Schedule

- Schedule in relation to the in-service date of the EWT upgrade is of critical importance.
- Correspondingly, the capacity of the transmitter to be designated to design the EWT expansion within the proposed schedule must be given favourable weighting, or alternatively, a high level of importance.
- The Board in making its determination should give very favourable weighting, or alternatively, a high level of importance to indicia of capacity to avoid delays.

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### Decision Criteria - Consultation

- The NOACC-NOMA Intervenor submit that the Applicant to be awarded the status of Designated Transmitter must be able to demonstrate commitment to:
  - transparent, fair and meaningful consultation with affected landowners, as well as local Aboriginal and Metis and municipal communities;
  - Participation for Aboriginal and Metis and municipal communities that will be affected by the construction and operation the East West Tie;
  - in both the short and the long term, timely resolution, of contentious issues immediately as they arise; and
  - meaningful economic benefit to local Aboriginal and Metis and municipal communities during the design, construction and maintenance phases of the Tie upgrade.


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### Decision Criteria - Consultation

- The NOACC-NOMA Intervenor submit that a favourable weighting, or alternatively, be a high level of importance should be afforded in Applicants demonstrating such commitment.


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### Board Staff Submissions

- NOACC-NOMA Intervenors Support:
  - the imposing of milestones for the development of the East-West Tie Line outlined by Board Staff;
  - the reporting of progress adherence to scheduled milestones and reporting of progress
  - that the Board not adjust the schedule proposed by the designated transmitter in its application;
  - applicants to re-file their respective development schedules to allow the dates in the schedule to be adjusted to recognise the actual date of the Board’s designation decision
  - quarterly reporting requirements for the designated transmitter;

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### Board Staff Submissions

- NOACC support the Board staff submission that the OPA include in its Phase 2 submission any update it can offer with respect to the need for the East West Tie Line expansion and specifics, where applicable, as to how it has come to that conclusion; however, the March 29, 2011 letter from the Minister to the OEB, states that the EWT is required infrastructure for reliability and in the NW Region.
- The NOACC-NOMA Intervenors have also identified the need for the TBGS to ensure the reliability in the Northwest Region.

Legal Counsel