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April 3, 2014

Re: EB-2014-0022

Ms Kirsten Walli
Secretary, Ontario Energy Board
Box 2319, 27th Floor
2300 Yonge Street
Toronto M4P 1E4
boardsec@ontarioenergyboard.ca

Dear Ms. Walli:

Please consider this as an interrogatory to the applicant, Suncor, on behalf of the Concerned Seniors Lambton County, and WAIT_PW.

From Suncor's Application for Leave to Construct, dated January 21, 2014

Exhibit B, Tab 2, Schedule 1, Page 1 of 5, the first paragraph states:

"Suncor Energy Products Inc. ("Suncor") is the owner of the project. Suncor is applying for leave to construct the Proposed Transmission Facilities that will enable Suncor to convey electricity from its proposed Cedar Point Project to the Independent Electricity System Operator ("IESO") controlled grid."

For background information:

In section 1.1 of the Act, the Board objectives are stated as:

"1. (1) The Board, in carrying out its responsibilities under this or any other Act in relation to electricity, shall be guided by the following objectives:

1. To protect the interests of consumers with respect to prices and the adequacy, reliability and quality of electricity service.
2. To promote economic efficiency and cost effectiveness in the generation, transmission, distribution, sale and demand management of electricity and to facilitate the maintenance of a financially viable

electricity industry.

3. To promote electricity conservation and demand management in a manner consistent with the policies of the Government of Ontario, including having regard to the consumer's economic circumstances.

4. To facilitate the implementation of a smart grid in Ontario.

To promote the use and generation of electricity from renewable energy sources in a manner consistent with the policies of the Government of Ontario, including the timely expansion or reinforcement of transmission systems and distribution systems to accommodate the connection of renewable energy generation facilities. 2004, c. 23, Sched. B, s. 1; 2009, c. 12, Sched. D, s. 1. “

The OEB mandate when considering new projects or expansion to existing projects, as described in Section s.92 of the Ontario Energy Board Act, is reprinted below:

And...

“Applications under s. 92

(2) In an application under section 92, the Board shall only consider the following when, under subsection (1), it considers whether the construction, expansion or reinforcement of the electricity transmission line or electricity distribution line, or the making of the interconnection, is in **the public interest**:

1. **The interests of consumers with respect to prices** and the reliability and quality of electricity service.
2. Where applicable and in a manner consistent with the policies of the Government of Ontario, the promotion of the use of renewable energy sources. 2009, c. 12, Sched. D, s.16.” (emphasis added)

For Suncor's consideration and reply:

The wording of s.92 and the fact that this application is under consideration by the OEB, implies that this transmission facility will provide a benefit to the consumer should it proceed.

In order to participate fully and in a more knowledgeable manner in this hearing, we wish to have a better understanding of what the contribution from this transmission line will be, and what the benefit to consumers will be. Thus we would ask Suncor to provide the following information listed below. In the event that Suncor is not in a position to provide the answers, we would ask the other stakeholders to provide their input as they see fit:

1. The wording ***“in the public interest”*** and ***“the interests of consumers”*** appear in the OEB Act and in the PO1 document. Our understanding is that both terms refer to the ratepayers and taxpayers in the province. Is this consistent with Suncor's understanding of these terms?
2. Section 1.1 of the Act, includes the following directives to the Board:
 1. ***“To protect the interests of consumers with respect to prices”, and***
 2. ***“To promote economic efficiency and cost effectiveness in the generation, transmission, distribution, sale and demand management of electricity and to facilitate the maintenance***

of a financially viable electricity industry”

We interpret that to mean that the Board is tasked to consider all options in the generation, transmission, distribution, sale and demand management of electricity, and to select the lowest cost option, so long as that option does not compromise the safety and reliability of the grid or electricity supply. Is this interpretation consistent with Suncor's interpretation?

3. The fourth item in the Section 1.1 of the Act includes the following directives to the Board: ***“To promote the use and generation of electricity from renewable energy sources in a manner consistent with the policies of the Government of Ontario, including the timely expansion or reinforcement of transmission systems and distribution systems to accommodate the connection of renewable energy generation facilities”*** We understand “timely” to mean that any required facilities are to be built and operational before the need arises, but we are uncertain what timeframe this refers to. What is Suncor's interpretation of “timely expansion” in terms of months or years?
4. Based on the nameplate capacity of the electrical source, and the meteorological data on the availability of favourable weather conditions, what is the total potential quantity of electricity, in MWh, that Suncor believe could be conveyed to the IESO controlled grid through this transmission line for each quarter during the first full calendar year of operation, and on a yearly basis for the next five years?
5. Based on:
 1. the current (Q1 2014) base capacity of the IESO grid,
 2. the projected electrical demand provided by the IESO,
 3. the overlap of favourable weather conditions and electricity demand above the current base capacity of the IESO grid,
 4. the new rules for power dispatching that came into effect in September 2013,what is Suncor's estimate of the total actual quantity of electricity, in MWh, that will be delivered by this transmission line to the grid for each quarter during the first full year of operation, and on a yearly basis, for the next five years expressed in terms of MWh?

Thank you for your cooperation.

Santo Giorno