

Sustainability-Journal.ca

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Error in Procedural Order No. 5

Procedural Order No. 5 contains the following statement:

"Sustainability Journal did not prioritize the issues list but provided a list of new issues in its submission. The Board reminds Sustainability Journal that the un-prioritized issues list was finalized and issued on February 19, 2014."

That statement is incorrect. We had in fact made two submissions regarding the issues long before the Feb. 19 date of the OEB listing (sent 21/11 and 16/12, 2013). Those submissions both covered the same issue - using storage to reduce power costs. Our most recent letter of 31/03, 2014 lists our reasons why this issue deserves a very high priority from the public's point of view. It was never intended to add a string of new issues but it **certainly was intended** to bring attention to a fundamental issue that was missing from the Board's list even though it had been appropriately proposed.

The issue in question is the potential for using distributed energy storage. Such storage reduces the need for generating peaking power and in some variants it can also deliver a large amount of additional energy in its own right. There are many different technologies in use for storing energy in both electrical and thermal forms. Our expertise is in the area of the physics of systems that integrate both functions into a single system - a marriage that is highly synergistic.

The purpose of Review EB-2013-0321 is to consider OPG's pricing for power from their hydro and nuclear facilities. OPG could operate profitably with much lower power prices if the systems included energy storage so the issue is completely relevant to the objective of the review. I submit that the Board should not have omitted it from the list of issues to be discussed.

It is really not feasible to discuss pricing without considering the other impacts of any proposed change. Our explanation of 31/03 briefly lists the six ways in which energy storage would radically improve the performance of Ontario's energy system - safety, capital cost, power pricing, environmental protection, sustainability and resilience.

If the Board does not consider this issue (which was appropriately raised at the proper time) the direct result will be the continuation of a system that is costing hundreds of lives, wasting tens of billions of dollars, that is adding over 100 million tonnes of GHG to Ontario's annual emissions, and that is neither sustainable nor resilient. None of the variables related to the issues in the Board's present list of issues are capable of yielding comparable results.

Ron Tolmie