



P.O. Box 70 Hearst Ontario P0L 1N0 ☎ (705) 362-4488 📠 (705) 362-4563

June 21, 2018

Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto ON M4P 1E4

by email: boardsec@oeb.ca

Attn: Ms. Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: Board File No.EB-2018-0098 Hydro One Networks Inc.
- Kapuskasing Area Reinforcement Project (KARP)

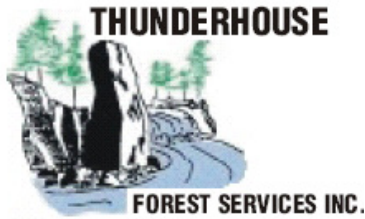
I am writing to submit comments on the above application by Hydro One to upgrade a segment of existing transmission line. Hydro One submits that KARP “[is in the public interest](#)” and needed “[to ensure that the area continues to receive a safe and reliable supply of electricity](#)” after 2020 because “[of the inability to rely on local generation facilities as a firm generation source](#)” “[following the contract expiry of local area generators.](#)” “[Once the generation contracts have expired, these facilities can no longer be relied on to meet local needs. Supply of load in the Area will then become dependent on external resources...](#)” (quotes in blue from Hydro One’s application).

When Atlantic Power Corporation’s Calstock plant was built nearly 20 years ago, the forward-looking design resolved the major issue that was created by shutting down the old bark burners; waste sawmill and plywood factory residues no longer had to be landfilled. Instead, together with recovered waste heat from the adjacent pipeline compressor station, wood waste was now transformed into sustainable, green, low-carbon electricity well ahead of today’s concern and knowledge about Climate Change. As well, the contracted rate for electricity is well below the grid average, an important aspect of ratepayers’ concern today for expensive utility bills.

Thunderhouse Forest Services Inc. is a forestry consulting and contracting firm in Hearst. We employ 45 on an annualized basis. Our team of forestry professionals, technicians and silviculturalists supply services to local industry including managing the Hearst Forest sustainably for our use today and for the benefit of future generations. We rely on the economic health of Hearst and surrounding communities which depend on the local forest industry’s existence.

I ask OEB to insist that Hydro One do a more comprehensive cost/benefit analysis of KARP to demonstrate that spending \$21.1 million on this transmission upgrade is truly in the public interest. The analysis must address renewing the Calstock plant contract as an alternative to the upgrade and also include an accounting of the negative environmental, economic and social impacts of closing down the Calstock plant, including the following;

- Methane emissions that will result from new landfill of mill wastes and lost opportunity to remediate old existing mill waste landfills.



P.O. Box 70 Hearst Ontario P0L 1N0 ☎(705) 362-4488 📠(705) 362-4563

- Lost carbon capture due to loss of productive forest land because in our forested landscape, forest will inevitably be cleared to make room for more landfill.
- Loss of productive forest land and carbon capture when right-of-ways are cleared or widened for increased transmission capacity.
- Economic synergies that the Calstock plant offers to the 3 local forest sector mills, including their economic viability related to increased operating costs if they must return to landfilling wood waste.
- Opportunity to increase the use of green, low-carbon forest biofuels for Climate Change mitigation which will simultaneously improve the quality of forest management, increase industrial synergy and increase forest carbon capture.
- Employment in the Calstock plant and in supply and service enterprises directly related to it as well as the effect on indirect employment and community services such as commerce, health care and education.
- Overall economic contribution to Hearst, Constance Lake First Nation and surrounding communities from the Calstock plant.
- Non-business/charitable contributions to community facilities and services from the Calstock plant.
- Negative impacts upon water bodies and fisheries in our region of promoting further consumption of hydroelectricity.

Thank you for this opportunity to comment. I urge OEB to ensure that all the benefits provided by the Calstock plant are considered in the evaluation of KARP .

Best regards

George Graham R.P.F.
Managing Partner

C Roger Sigouin, Mayor, Town of Hearst
Rick Allen, Chief, Constance Lake First Nation
Luc Brunelle, Plant Manager, Atlantic Power Corporation
Guy Bourgouin, MPP Mushkegowuk- James Bay
Vic Fedeli, MPP Nipissing