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5/2/14

Re: EB-2014-0022
Ontario Energy Board
Attn: Kirsten Walli, Board Secretary
P Box 2319
27th Floor
2300 Yonge Street Toronto ON M4P 1E4

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ONTARIO ENERGY BOARD

April 25, 2014

Dear Ms. Walli,

In accordance with OEB Rule 29.3, Concerned Seniors Lambton County and WAIT-PW submits the following motion to the Board:

That the Board require the Applicant to provide full and adequate responses to Concerned Seniors Lambton County & WAIT-PW_IR_Suncor_20140403

We respectfully submit that the following Interrogatories are relevant and that the Applicant has or can gain access to the information needed to provide answers. The reasons for that contention are set forth below. The chronology of Concerned Seniors Lambton County & WAIT-PW_IR_Suncor_20140403, and Suncor_IRR_20140417 follows.

Preamble:

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"

Original Question:

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?

Suncor's response:

In leave to construct applications, the Board considers the stand-alone economic viability of the proposed transmission facility to ensure that it does not impose undue costs on existing ratepayers. In cases like this one, where the applicant (Suncor) agrees to pay the capital and operating costs of the proposed transmission facility, the Board has deemed the project to be economically viable. More generally, the Board regulates the transmission and distribution of electricity; it does not regulate the price of the electricity commodity.

Follow-up:

As taxpayers, we do not share Suncor's view that they (Suncor) will pay the capital and operating costs of the proposed transmission facility.

Suncor will be able to claim the very generous 50% capital cost allowance (Class 43.1) as well as some of the design and operating expenses for this facility against future revenue. In essence, the taxpayers will reimburse Suncor for a significant portion of the capital costs. As taxpayers and ratepayers, due diligence compels us to verify that the proposed facility is economically viable as claimed.

We are cognizant that the Board does not regulate commodity prices, and that Suncor cannot speak for the OEB, but, **we respectfully request that the Board require Suncor to review with the Board and articulate a very basic concept; do Suncor and the Board agree that in Section 1.1 of the Act, the OEB's directive, the Board is required to consider all options in addition to the proposed facility and to ensure that any option chosen "best protects the interests of consumers as regards to pricing", so long as that option does not compromise the safety and reliability of the grid or electricity supply?**

Preamble:

2. 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"

Original Question:

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?

Suncor's response:

Suncor interprets the Board objectives cited in the question to include the responsibility to consider the application by transmitters for leave to construct facilities to attach their renewable energy projects to the IESO-controlled grid (or distribution system) as appropriate, in a timely

fashion. Because Suncor's FIT contract contains commercial milestones for placing the generation project in service, the Board's consideration of the leave to construct application needs to be "timely" in the sense of being synchronized with the generation project's commercial timetable.

Follow-up:

Suncor has interpreted "timely" in the context of their timeline for a speculative commercial venture.

We do not believe that Suncor's urgency in their timelines for a commercial venture should create or dictate any urgency in the schedule of the IESO in planning the timely upgrade of the grid. Nor do we believe that Suncor's urgency in their timelines for a commercial venture should create any urgency on the part of the OEB in its consideration of the proposed facility. We are cognizant that Suncor cannot speak for the IESO, thus: **we respectfully request that the OEB require Suncor to obtain and share the IESO's interpretation of "the timely expansion or reinforcement of transmission systems and distribution systems to accommodate the connection of renewable energy generation facilities"**

Original Question:

3. 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?

Suncor's response:

The Cedar Point Project and associated transmission facilities has been designed to provide up to 100 MW (nameplate capacity) of renewable energy to the IESO-controlled grid, consistent with its obligations under the FIT contract. The information requested is considered commercially sensitive.

Follow-up:

We are puzzled why Suncor considers this information to be commercially sensitive. In our desire to fully understand what the benefit to the consumer might be, our query was simply to confirm what is readily available and published numerous times and in numerous venues:

The wind turbine selected by Suncor has a maximum capacity of 2.3 Megawatts (MW)

There are 8760 hours in a year (365 days x 24 hours)

It is estimated that A 2.3 MW wind turbine will generate around 30% of its maximum theoretical capacity, due to the wind availability, resulting in 6044 Megawatt hours (MWh) generated per turbine per year.

Thus Suncor's 46 turbines are capable of generating a maximum of 278,042 MWh per year.

We respectfully request that the OEB require Suncor to confirm or modify our calculations.

Original question:

4. 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?

Suncor's response:

The Cedar Point Project and associated transmission facilities has been designed to provide up to 100 MW (nameplate capacity) of renewable energy to the IESO-controlled grid, consistent with its obligations under the FIT contract. The information requested is considered commercially sensitive.

Follow-up:

Again, we are puzzled why Suncor considers this information to be commercially sensitive, especially in light of the fact that the IESO publishes the actual data for individual generating facilities in their Generators and Capability Report.

We assume that Suncor believes this proposed transmission facility will provide some benefit to the consumer in the form of electricity for the grid. The information we requested speaks directly to a metric for that benefit.

We understand that the actual delivery to the grid is controlled by the IESO, and that the IESO has forecast both generating capacity and electricity demands for the grid; thus, **we respectfully request that the Board require Suncor to provide this information, or require Suncor to obtain a best estimate from the IESO on how much electricity, in MWh, the IESO will draw through the proposed transmission facility and share that information with us.**

Thank you for your consideration.

Best Regards
Santo Giorno

