

THE PROVINCIAL COUNCIL OF WOMEN OF ONTARIO

Established 1923

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RE: EB-2007-0707

Application for Approval of the Integrated Power System Plan and Procurement Processes by the Ontario Power Authority (OPA) Phase One, Draft Issues List

The Provincial Council of Women of Ontario (PCWO) submits the following list of issues which reflect our long standing concerns for the general public interest as related to health, safety and environmental protection. Our view is not one of self interest regarding such concerns as jobs or a particular mode of electricity generation, or as promoters of an alternative long term plan for Ontario's electricity future, but rather, it is one that considers sustainability and the precautionary approach to be paramount in the development of a long term electricity plan that is fiscally prudent, respectful of the Government's directives and legislation, and in the best interests of the people and environment of Ontario, now and in the future.

To this end, the Ontario Energy Board's December 8th 2006 Staff Discussion Paper, the November 16th, 2006 Draft Report of the Board, and the December 27th, 2006, Final Board Report on the Review and Filing Guidelines Applicable to the Ontario Power Authority's Integrated Power System Plan and Procurement Processes have been reviewed again. As well, a preliminary review of the Ontario Power Authority's August 29th 2007 application to the Board for approval of its IPSP has been completed and the OPA's proposed "Issues List" has been considered.

The following list of suggested issues is directed at "issue (1)" of the draft OPA issues, noting that this issue ought to reflect compliance with all relevant legal obligations and not just directions issued by the Minister.

While the purpose of the issues list is to provide structure to the review of the IPSP, it is important that the issues list not reduce the importance of overarching principles and purposes to mere "considerations". The protection of human health, safety and the environment must be a focus of the IPSP and its review as a whole, in addition to being considered vis-a-vis specific elements.

Suggested Issues

Similar to the OPA's Issue List, the PCWO "Issues" are in question format as follows:

1. Does the IPSP take a precautionary approach to the protection of human health, safety and the environment?
2. Does the IPSP succeed in providing the highest possible level of protection for human health, safety and the environment?
3. To what extent does the IPSP succeed at recommending a sustainable energy future for Ontario, especially in light of the rights and needs of future generations?
4. Does the approach to "sustainability" in the IPSP reflect the priorities and concerns of the public in relation to the protection of human health, safety and the environment?
5. Does the IPSP take a reasonable approach to the concept of risk, including consideration of vulnerable populations of people, such as children, the elderly and people with illnesses?
6. Does the IPSP include all reasonably foreseeable risks, including risks associated with implementation of the recommended options, such as catastrophic risk associated with nuclear generation and the difficulties in extending the life of existing nuclear plants or the siting of high impact facilities?
7. Does the IPSP take a reasonable approach to the consideration of human health and environmental impacts and benefits, including baseline measurements, risk assessment and health and environmental outcome reporting?
8. Does the IPSP approach to cost reflect the protection of human health, safety and the environment as a priority? In particular, does cost include cradle to grave financial implications that expressly include health and environmental outcome reporting, as well as the potential for a worst-case scenario, such as an incident of a catastrophic nature?
9. Is the IPSP analysis and background information sufficient? i.e. Has the OPA consistently used up-to -date and accurate information to formulate its Plan? For instance, has it enhanced its background materials re the life-cycle cost analysis of nuclear to include all aspects?
10. Do the IPSP goals, particularly that of a "maximum" target for nuclear power, allow the flexibility required to adapt the "plan" over time to reflect future domestic and international improvements in levels and forms of protection for human health, safety and the environment?

11. Has the IPSP been developed with meaningful public consultation? In particular, did the consultation process reflect the public's high concern for the protection of human health, safety and the environment? Did the process incorporate perspectives that address these issues broadly, in addition to perspectives of communities that may be particularly affected?

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