



December 16, 2016

Andrea Pastori
Cabinet Liaison and Strategic Policy Coordinator
Ministry of Energy
Strategic, Network and Agency Policy Division
Strategic Policy and Analytics Branch
77 Grenville Street, 6th Floor
Toronto Ontario
M7A 2C1

Submitted via EBR/ltep@ontario.ca

Dear Ms. Pastori:

Re: Long-Term Energy Plan Consultations

AMPCO is the voice of industrial power users in Ontario. Our mission is industrial electricity rates that are competitive, fair and efficient.

Attached are AMPCO's comments to the Ministry of Energy on its 2017 Long-Term Energy Plan. AMPCO appreciates the opportunity to provide such feedback.

Best Regards,

[Original signed by]

Colin Anderson
President

Long-Term Energy Plan

Submissions of the Association of Major Power Consumers in Ontario (AMPCO)

EXECUTIVE SUMMARY

The 2017 Long-Term Energy Plan (LTEP) consultation is a critical component in crafting an energy strategy that will endure for a generation to come. Getting it right is not just a “nice to have” - it is absolutely essential for the economic wellbeing of Ontario.

The paramount consideration for the 2017 LTEP must be affordability. Decisions of the past have made achieving affordability (both today and tomorrow) a challenge going forward, so every effort must be expended in satisfying this critical objective. There should be no stone left unturned, meaning that structural changes as well as new programs and new funding sources should all be considered in the achievement of the affordability objective. Each plan element within the LTEP should be evaluated against this criterion.

Reliability is also a consideration, and any reliability issues need to be investigated to reduce their current impact on industrial operations and to ensure that existing undesirable effects are not unintentionally amplified as a result of future LTEP changes.

A major differentiator of the 2017 LTEP from that of 2013 is the consideration of climate change. Advancement of climate change mandates should not be blind to their effects on the electricity system, and accordingly, consideration of the LTEP and the Climate Change Action Plan must be harmonized to ensure that electricity prices are not further impacted, to the detriment of Ontario’s industrial customers, and the province as a whole. In particular, electricity price impacts in the post-2020 period need to be minimized.

INTRODUCTION

Ontario's electricity system is complex and almost always changing. AMPCO provides Ontario industries with effective advocacy on critical electricity policies, timely market analysis and expertise on regulatory matters that all affect their bottom line. We are the forum of choice for major power consumers who recognize that their business success depends on an affordable and reliable electricity system.

These are the submissions of the Association of Major Power Consumers in Ontario in relation to the Ministry of Energy's consultation on the 2017 Long-Term Energy Plan. AMPCO's Members are major power consumers, responsible for over 15 TWh of annual load in the province. A robust, efficient and affordable energy supply is critical to the success of their businesses, which is why AMPCO has an interest in this consultation.

AMPCO has summarized its key recommendations at the end of this submission. AMPCO appreciates the opportunity to provide feedback and looks forward to continued dialogue with the Ministry.

GOVERNANCE ISSUES

Any Long-Term Energy Plan requires very careful consideration. It is not simply a document that sets out a supply mix for electricity for the province, nor is it merely a showcase for emerging technologies. It charts a course to plan "the future of Ontario's energy system and the government's plan to maintain a reliable supply of clean, affordable electricity"¹. As such, it is important to understand at the outset what success looks like and how we will recognize it when we see it.

Much can be taken from the statement above, lifted directly from the Ministry's website. Progress has been made in the recent past in making Ontario's electricity system cleaner - the phase-out of coal generation and the subsequent increase in renewables have served this particular objective well. In AMPCO's submission, it is

¹ <http://www.energy.gov.on.ca/en/ltep/>

now time to focus on the other two adjectives that appear above - “reliable” and “affordable”, with affordability now being the paramount concern. These are the two touchstones to which AMPCO will return, a number of times, throughout this submission. Anecdotally, AMPCO submits that it may be possible to “maintain” a clean supply, but it may be more accurate to say it is the government’s plan to “achieve” an affordable system, since one cannot maintain what one has not yet achieved.

Returning to the concept of understanding success and being able to recognize it, an ultra-clean supply mix which no consumer can afford is unlikely to be the desired end state. Similarly, a system that has replaced “dirty” megawatts with “clean” ones, but has not replaced other elements which make the system more operable (which leads to a decline in reliability or power quality) cannot be deemed desirable. In AMPCO’s submission, in much the same way as a supply mix typically employs a portfolio approach, we need to employ a similar approach in the LTEP consultations that will result in acceptable levels of cleanliness, reliability and affordability. Accordingly, perhaps some targets can be developed that serve the objectives, and the Plan that results from these consultations and submissions can be measured against those targets. Balance is achieved in such ways.

In regards to governance, one element for consideration is the need to contemplate more than just rate base when seeking solutions to the affordability problem. Seeking funding sources outside of the classic energy space is a reasonable means of increasing the probability of achieving potential solutions. This will be further discussed in the section on ELECTRICITY PRICING ISSUES.

STRUCTURAL CONSIDERATIONS

Ontario is at a critical juncture in respect of electricity pricing, and time is of the essence. Prices are high and are forecasted to climb even higher. In considering the current system exclusively from the perspective of affordability, in some ways significant and rapid improvements in regards to end use pricing are precluded by the

system's very structure itself. High contracted and regulated generation prices contribute to a massive global adjustment problem, with no sign of future relief. Billions of dollars of transmission infrastructure improvements are planned for the coming years, putting upward pressure on regulated transmission rates. This situation leads to one of three natural conclusions. Either prices continue to skyrocket beyond the ability of many residents and industries to pay, or incremental improvements are pursued leading to small pricing changes on the margins, or fundamental structural changes are considered, investigated and implemented that result in material improvements in respect of pricing for end use consumers. In AMPCO's submission, it is time to reflect on - and pursue - material and significant changes that truly bend the cost curve.

The following sets out some possible structural changes for consideration. These changes would not be easily achieved, nor are they being suggested for consideration lightly. AMPCO understands that these are material changes that would require considerable effort and some short-term pain. However, in AMPCO's submission, Ontario's pricing problem has reached a critical mass that requires contemplation of significant intervention - short-term pain may be necessary to achieve longer-term health of the system. That is the spirit in which these suggestions are being offered.

1. Regulated Generation and Transmission

Regulation of transmission is a response to the natural monopoly that exists in the space, intended to provide some price discipline where none exists due to lack of competition. Regulation of prescribed generation, on the other hand, was implemented to have a moderating effect on generation pricing, which was intended to exist in an open market. Neither has worked particularly well.

Hydro One's rate application currently before the Ontario Energy Board (OEB) requests an increase of 3.7% in 2017 and 5.4% in 2018. Ontario Power Generation's (OPG's) application is seeking an unprecedented 69% increase in its nuclear payment amounts between 2017 and 2021. These are the types of cost pressures that further exacerbate the uncompetitive nature of electricity prices in Ontario as compared to

our neighbours, and make it next to impossible for many consumers to deal with their electricity bills. And yet, they are the natural outcome of our current regulated system.

Both Hydro One and OPG are breaking no laws in filing such applications, and given the structure of regulation in Ontario, they are incented to do so. Their position is simple - because their costs are increasing, it is reasonable for them to pass those increases along to their customers. AMPCO wishes that its Members could react so simplistically to their own cost pressures. However, AMPCO's Members cannot unilaterally increase their prices, because their customers will find alternative suppliers, perhaps in other jurisdictions. It is just that simple. In a related fact, many AMPCO Members have made significant investments elsewhere while the climate is not right to make those same investments in Ontario.

While the current migration from cost of service regulation to incentive based regulation (with its proposed decoupling of rates from a utility's costs in favour of increased productivity and efficiency) may ultimately help, base rates are still established using a cost of service methodology; the same methodology that encourages utilities to increase rate base and to pass along their escalating costs under a flag of prudence, notwithstanding the consumer's inability to pay. Perhaps some changes need to be contemplated within this structure.

Elements of Ontario's general form of regulation require some careful consideration. Both OPG and Hydro One are considered Ontario Business Corporation Act entities, which implies that they must "stand alone" and achieve a commercial rate of return, in order to be able to attract capital on a consistent basis with other entities that are not government owned. This exists even though neither organization typically raises capital in the public markets, although with Hydro One's recent ownership adjustment this may change. AMPCO suggests that perhaps the Ontario government should reconsider this "stand alone" approach for its agencies in order to reduce the rate ask included in their regulatory applications. The amount of revenue flowing to these two entities resulting from this approach through return on equity (ROE) is

measured in hundreds of millions of dollars per year. This represents hundreds of millions of dollars in upwards price pressure for customers that need not exist. Areas of potential consideration for change include the allowed ROE (currently established by the OEB), the deemed equity thickness of the organizations (a theoretical capital structure number used by regulators), and in some cases the existing book value of certain of the utility's assets - book values that were changed arbitrarily in 1999 when the old Ontario Hydro was de-merged into its successor companies. All of these areas could be reviewed within the context of reducing revenue requirements for the regulated entities, and ultimately the rates that they charge for electricity².

Finally, the capital programs of both entities over the next five years are a concern. According to Hydro One's application materials currently before the OEB, \$6.1B of capital is forecast to be spent between 2017 and 2021. For OPG nuclear, approval is requested for approximately \$6.5B of capital over the same time period³. The future closure of these amounts to the utilities' rate bases will increase generation and transmission rates consistent with the ROE discussion set out above. AMPCO submits that, pending the finalization of the LTEP, perhaps a more streamlined capital spend is appropriate. In this way, proposed rate increases could be moderated, and the capital programs of both entities could be more accurately aligned with the affordability objective of the LTEP.

2. Market Renewal

Currently, the Independent Electricity System Operator (IESO) is initiating a project to fundamentally renew the Ontario electricity market. While the costs, benefits and objectives of the initiative are not yet fully developed, it was clear from a November 28, 2016 speech at the Empire Club of Canada by Minister Thibeault, that the focus of Market Renewal must be cost control.

² Obviously, Hydro One's recent IPO may impact government's ability to address this directly, but some form of change should be considered.

³ OPG's Hydroelectric capital spend for the period is not included in this, since OPG's Hydro application to the OEB is made using an Incentive Regulation methodology, not a Cost of Service approach.

“Not only must we endorse the goals of Market Renewal, but embrace them as the effective next steps in Ontario’s wholesale market evolution and a key driver of cost containment in this sector. This reform will play a key part of achieving the goal of continued bending in the cost curve.” [emphasis added]

AMPCO applauds this focus and believes that it can best be achieved by first completing a thoughtful Long-Term Energy Plan for Ontario and then reviewing the market and renewing it within the context of that Plan. To renew the market first subordinates the Plan to the outcomes of the Market Renewal process - a result that clearly places the cart before the horse. AMPCO submits that an LTEP that considers affordability to be the paramount consideration could have dramatic impacts on the scope and objectives of Market Renewal.

3. Contracted Generation

The prices paid to contracted generators provide significant upward pressure on global adjustment. Whether long-term NUGs or more recently contracted generation, the terms of these contracts should be re-evaluated to determine if any changes are possible. As evidenced by the Brattle Group’s November 23, 2016 Market Renewal Update (slide 36), PJM successfully cancelled certain procurement contracts and realized a cost savings within the context of a capacity market. While AMPCO does not suggest a wholesale cancellation of contracts would be reasonable from a financial or reputational perspective, a critical assessment of generation contracts should be performed to determine if improvements are possible under reasonable terms.

ELECTRICITY PRICING ISSUES

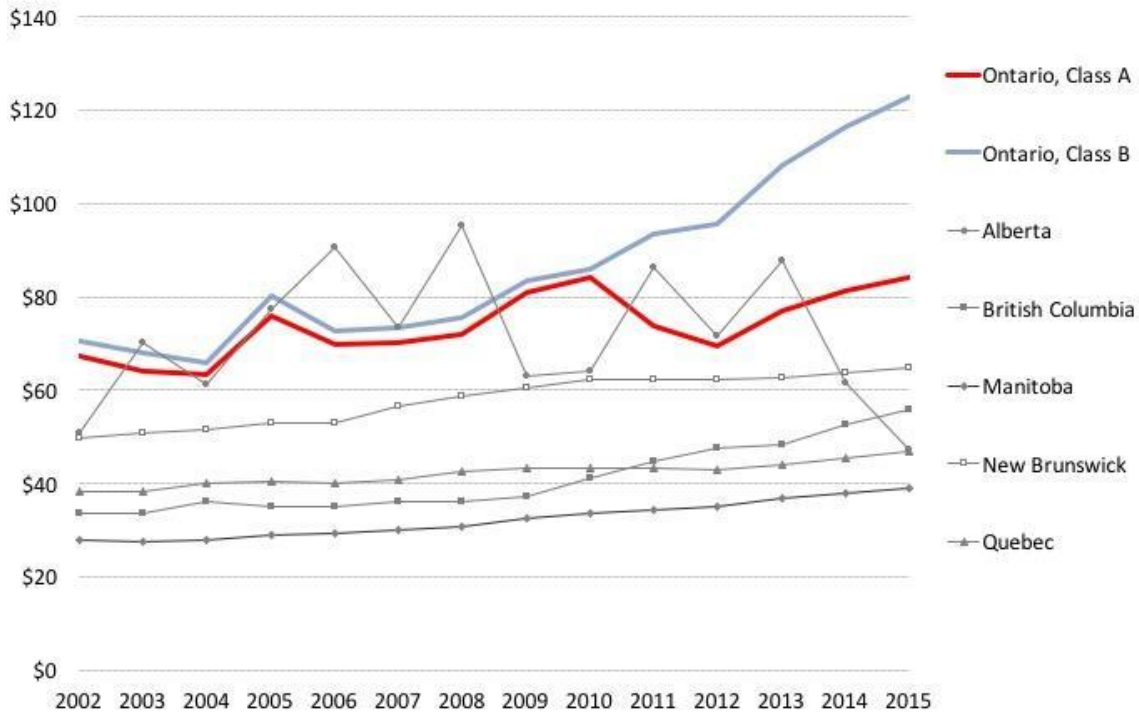
Ontario needs industry - it has been, and continues to be, a critical part of Ontario’s economy. With it, comes investment and employment. And if industry is the beating heart of Ontario, then electricity is the lifeblood that powers industry and sustains Ontario’s economic health.

Between 2012 and 2015, Ontario's nominal cost of Class A industrial power has increased by over 20%. Class B power has increased by almost 30%. Residential rates have climbed too, making it difficult for many consumers to keep up in a world where, according to Statscan, average annual CPI has increased less than 1.5% over the same time period. Such is the current legacy of our cleaner system.

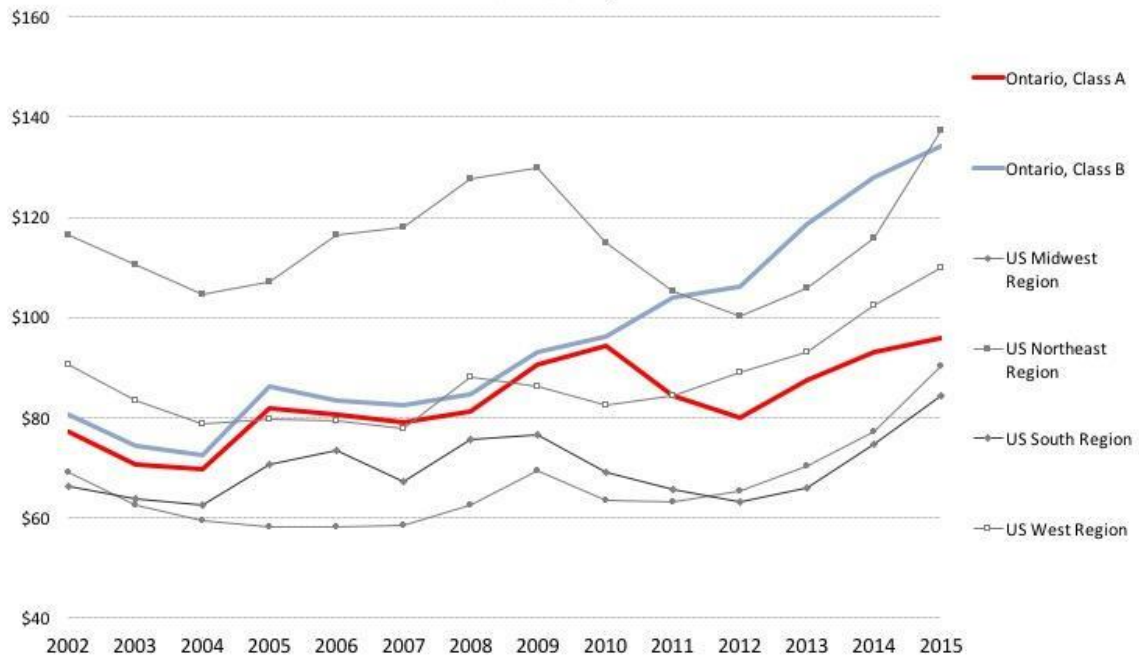
Many industrial loads list electricity as one of their most expensive inputs. This is particularly problematic when one considers the global nature of competition. Gone are the days when industry had to compete with only their local neighbours. Today, industrial products are sourced globally - which means that the price to produce has never been more critical. Ontario industry has streamlined its operations and become more efficient. We now do more with less. We have embraced world class health and safety standards and our employees and the public are better off because of this. We have adopted advanced environmental standards, making the water we drink and the air we breathe cleaner. We abide by stringent labour laws - to the benefit of our employees and their surrounding communities. And Ontario is about to embark on a journey into climate change regulation (that brings with it considerable uncertainty and potential expense). This superlative performance doesn't come at zero cost - and this challenges us to maintain our competitive focus against others who may not embrace such standards. So when our industrial rates for electricity (a critical input to many of our products and processes) are far above the rates in neighbouring jurisdictions (and not just higher, but more volatile), it adds yet another challenge to our ability to compete. It is a challenge that industry needs help in meeting.

The graphs below show Ontario industrial power prices, as compared to other jurisdictions in both Canada and the United States.

Average wholesale delivered price of power for industry in Canada
Nominal CDN\$/MWh



Average retail (LDC) delivered price of power for industry in Ontario vs. US markets
Nominal CDN\$/MWh



The story they tell is grim. It is one of escalating price, reduced competitiveness and economic challenge.

As set out in the Ministry's Discussion Guide for participating in the LTEP consultations, "Electricity Pricing - Rate Mitigation" is a specific section that requires attention. Within that section, a number of initiatives are highlighted as steps that have been taken to mitigate industrial prices. Programs like the Industrial Conservation Initiative, the Industrial Electricity Incentive Program and the Northern Industrial Electricity Rate Program are all examples of positive government actions to address the issue of industrial electricity pricing. AMPCO acknowledges these steps and appreciates the assistance that has been provided by government, but also wants to point out that these programs are limited in both scope and amount - they don't help everyone. There are numerous industries - critical to the economic health of their communities and the province - who either do not qualify for such programs or physically cannot change their operations due to process or equipment limitations to take advantage of them. So maintenance of these programs is essential - but maintenance is not enough.

AMPCO's Members are not identical - nor are their operations. For that reason, a one-size-fits-all approach doesn't work. Programs need to be tailored to provide the assistance to industry that they need to remain competitive. New programs need to be established that will mitigate the cost of electricity to industry and keep Ontario's economic heart beating. Programs such as the Northern Industrial Electricity Rate Program need to be expanded to others who, through simple geography, are currently precluded from participating in this useful program. Similarly, initiatives like the Industrial Electricity Incentive Program should be re-evaluated and opened up to encourage investment in electricity intensive projects in the province, as a means of attracting much needed capital. These are only a couple of examples - AMPCO is certain that there are other initiatives as well that would prove useful.

Often the response that is offered to discussions of industrial rate mitigation includes a hypothetical choice of sorts; a choice that plays residential rates off against

industrial rates. An argument is made that, within the context of rates, creation of a “winner” in terms of provision of mitigation must necessarily create a “loser” on the other side. It may be true that this is a typical outcome in a situation where the size of the pie is fixed - it creates a zero sum game that means when one class of customers wins, the other class loses. However, that doesn’t always have to be the case.

Actions within the electricity sector have had positive economic impacts in other sectors. For example, the health care sector reported experiencing significant positive benefits associated with the closure of coal fired generating stations⁴ - positive in terms of its health impacts and the associated economics. Similarly, the refurbishment program at Darlington GS has been credited with a \$90B contribution to Ontario’s GDP and the creation of 14,200 jobs annually⁵. These taxpayer benefits are being paid for by the Ontario ratepayer. It should be reasonable to expect that benefits that accrue in one direction could potentially be returned in the opposite direction through other mechanisms. To be clear, nobody is suggesting a dollar for dollar exchange in such situations, but an acceptance that such wealth transfers exist, and should be permitted to continue, is absolutely necessary to reduce the impact of the zero sum game. By growing the pie, there need not be winners and losers. Accordingly, there can and should be some intermingling of rate base and tax base considerations. This adds options for a Ministry that is concerned about rates across the board and can and should be used by government to service the Ministry’s affordability objective.

ELECTRICITY SUPPLY MIX AND DELIVERY ISSUES

AMPCO generally does not take a position on electricity generating technologies and specific supply mix percentages. As already stated, we support a portfolio approach that mitigates fuel risk through diversity, but we are somewhat agnostic as to what type of black box to use for generating. However, we do believe that the choices that

⁴ <https://news.ontario.ca/mei/en/2011/12/ontario-shutting-down-two-more-coal-units.html>

⁵ <https://news.ontario.ca/mei/en/2016/10/nuclear-refurbishment-begins-at-darlington-generating-station.html>

are made in respect of supply mix have some knock-on effects that must be considered.

On September 1, 2016, the Independent Electricity System Operator (IESO) published a technical report, the Ontario Planning Outlook (OPO). Among its many conclusions, the OPO determined that supply actions taken over the past 10 years have left Ontario well positioned to meet future provincial needs. AMPCO believes this statement to be in respect of overall system adequacy, but not necessarily in respect of reliability. The two are not the same. As defined by the Ontario Market Rules (Chapter 11):

adequacy means the ability of the electricity system to supply electrical demand and energy requirements at all times, taking into account scheduled and unscheduled outages of equipment or components;

reliability means, in respect of electricity service, the ability to deliver electricity within reliability standards and in the amount desired and means, in respect of the electricity system, the IESO-controlled grid, the integrated power system or a transmission system, the ability of the electricity system, the IESO-controlled grid, the integrated power system or that transmission system to operate within reliability standards in an adequate and secure manner;

In short, the adequacy of supply of the system is a matter quite separate from the system's ability to operate within reliability standards.

As previously discussed, in service of the Ministry's "clean" objective, coal megawatts were removed from the Ontario electricity system. Notionally, these were replaced with megawatts from other technologies, some of which are renewables like wind and solar. But while the energy may have been replaced, there are other attributes of coal-fired generation that may or may not have been adequately replaced such as provision of operating reserve, voltage regulation, ramp capability, etc., - all of which contribute to system reliability. Additionally, the subject of power quality requires

specific mention. Notwithstanding that the Ontario Market Rules, the Transmission System Code and Transmission Connection Agreements all set out various parameters regarding the physical characteristics of the power injected into the Ontario grid, it remains a question in AMPCO's mind as to whether the change in supply mix over the last 10 years has been evaluated from a reliability, and specifically a power quality, perspective. Many AMPCO Members are now experiencing more transient power issues than they did a decade ago, with increasing damage to sensitive equipment - thereby further increasing their costs. The relationship to changes in supply mix may be one of correlation or causality, or neither. However, this area requires investigation to reduce the impacts that are already being felt, as well as to preclude the possibility of additional impacts as a result of further supply mix changes. Further, although the power system is continually evolving in respect of supply sources, the monitoring of the system may not have evolved at quite the same pace. It may be that we are operating a 2017 system while monitoring with a 1990s approach. Presumably, these issues are already being reviewed within the context of Market Renewal or other initiatives, but their linkage to supply mix and the LTEP must not be overlooked. Further supply mix changes can create further reliability and power quality issues. AMPCO recommends investigating these issues to reduce their current impact on industrial operations and to ensure that existing undesirable effects are not unintentionally amplified as a result of future LTEP changes.

Another operational area that should be considered within the context of the LTEP is Demand Response. Demand Response (DR) is a cost-effective, clean, reliable and flexible resource for electricity systems that will assist the government in meeting its Climate Change Action Plan goals, reducing consumer costs, and assisting the system operator adapt as the electricity sector evolves. Demand Response must continue to be a resource used by the IESO to provide capacity, energy and ancillary services for grid support and to reduce costs. Current Demand Response programs must be preserved and allowed to evolve as the system and fuel mix change. New Demand Response programs should be developed to support future changes to the system as they occur. As such, AMPCO submits that the government should continue its

commitment to retaining and growing DR as an important component of the 2017 LTEP.

INNOVATION AND ECONOMIC GROWTH

According to the Ministry's Discussion Guide, Ontario has made innovation in energy technology a priority. This is clear through the development and execution of numerous projects involving smart grid technology, energy efficiency, renewable generation sources and energy storage. Further, the government expects these technologies to be important export commodities for Ontario, thereby resulting in economic growth. AMPCO is hopeful that this will be realized, but wishes to point out that industry too has been busy innovating. In some cases Ontario industries have reduced emissions by over 90%, while doubling output. This ability to innovate has served our Members well by increasing production, lowering costs and, in some cases, positively impacting local employment by the addition of shifts within certain facilities.

AMPCO appreciates the need for innovation within the electricity sector, but is mindful of its own Members, their innovation and their needs for exporting commodities - all of which also contributes to the economic growth of Ontario. LTEP considerations which improve reliability and affordability will advance this growth for all.

CONSERVATION AND ENERGY EFFICIENCY

In the 2013 LTEP, where it was cost effective, conservation was ranked before building new infrastructure. This approach proved to be successful based on the conservation figures that are presented in the Ministry's Discussion Guide. While AMPCO understands the desire for a sustained commitment to conservation and energy efficiency to maintain and build upon the gains that have been achieved, in today's supply / demand environment (as set out in the OPO), the need for significant new build is materially lower than it was in 2013. Accordingly, and as set out

elsewhere in our submission, AMPCO believes that affordability and reliability are the most important considerations to be addressed in this iteration of the LTEP. So while conservation and energy efficiency are reasonable objectives for any long-term energy plan, they fall short of the criticality and urgency associated with the issues of affordability and reliability, of which affordability must be considered paramount. Additionally, included within the concept of affordability, are the mounting administrative costs of conservation programs. These programs must be delivered in a cost effective and efficient manner - a fact that can easily get overlooked in our zeal for providing such programs.

One final, compelling fact in regards to conservation - Ontario is at the point where even as consumers use less electricity, their bills continue to increase because of increasing rates. This provides a very practical illustration as to why affordability must trump conservation in the 2017 LTEP.

CLIMATE CHANGE AND LOW CARBON ECONOMY

This iteration of the LTEP is different than the last time. Ontario is further down a green energy trail, to be sure, and electricity prices are closer to top of mind than ever before, but these are not the most striking differences.

Carbon is the biggest difference.

With the advent of the *Climate Change Mitigation and Low-Carbon Economy Act*, the Ontario landscape has been radically transformed, and with it, the electricity sector. Environmental benefits await, in the promise of lower greenhouse gas emissions and a material win in the battle against global climate change. These are noble goals, but in our efforts to de-carbonize the province's economy we must ensure that we do not de-industrialize the province's economy at the same time.

From a global environmental perspective, we must also be cognizant of the geographic effects of Ontario's decisions. When investment in Ontario is discouraged due to increasing electricity prices, that investment (and the production that goes

with it) moves elsewhere - likely to a jurisdiction with lower emissions reduction standards. So as Ontario moves to de-carbonize its economy, a perverse consequence could be realized where total global emissions increase due to investment and production leakage to geographic areas whose industry possesses a larger carbon footprint than Ontario's. This is not only bad for Ontario industry or for Ontario residents - it is bad for the planet, as a whole.

The Ministry of the Environment and Climate Change has recognized that leakage prevention is important in the cap and trade regime and has taken steps to address this in regulation for "direct" emissions from manufacturing facilities. The government must ensure this practice gets continued within the electricity sector ("indirect" emissions) going forward.

The Climate Change Action Plan (CCAP) has the potential to increase the cost of electricity dramatically. Despite the electricity sector being largely carbon free with the elimination of coal-fired generation, the sector was nevertheless included in the implementation of the CCAP. Notwithstanding the government's commitment to apply certain of the Cap & Trade Program revenues to the electricity sector to guard against this, that commitment only lasts during the first compliance period (2017-2020). While AMPCO appreciates that commitment, industry needs to know what comes next, as uncertainty stifles investment. If some form of price mitigation is not included post-2020, Ontario's industrial loads will experience a step-change increase to their already steadily increasing electricity bills. Emissions Intensive Trade Exposed (EITE) companies have no way to pass these costs on to their customers and until competing jurisdictions have similar regulation, leakage of jobs and emissions will occur. All the arguments already advanced regarding global competitiveness will be even more important as Ontario's price disadvantage gets worse. AMPCO submits that thoughtful integration of the LTEP with the CCAP is essential to ensure that electricity prices are not further impacted, to the detriment of Ontario's industrial customers, and the province as a whole. In fact, given the small impact of the Ontario electricity sector on climate change, AMPCO submits that it would be reasonable to reconsider its exclusion from the CCAP post-2020.

SUMMARY OF AMPCO KEY RECOMMENDATIONS

1. Affordability must be the paramount concern of the 2017 Long-Term Energy Plan.
2. Targets can be developed that serve the objectives of the LTEP and the Plan that results from these consultations and submissions can be measured against those targets.
3. Ontario's existing rate regulation framework, and the capital budgets of OPG and Hydro One, should be reviewed from the perspective of rate minimization and affordability.
4. Ontario's Market Renewal Initiative should have cost containment as its primary objective, and its execution should be delayed until after the LTEP has been completed.
5. Government should assess existing generation contracts to determine if system cost improvements are possible to them under reasonable terms.
6. AMPCO appreciates the existing industrial rate programs and supports their continuation.
7. New industrial rate programs should be investigated and implemented.
8. Government's affordability objective can be furthered by considering funding from both rate base and tax base, in order to "grow the pie" and eliminate winners and losers.
9. Reliability issues need to be investigated to reduce their current impact on industrial operations and to ensure that existing undesirable effects are not unintentionally amplified as a result of future LTEP changes.
10. Government should continue its commitment to retaining and growing DR as an important component of the 2017 LTEP.
11. Government should consider excluding the electricity sector from the CCAP post-2020. In any event, post-2020 assistance and price certainty for industry is necessary.