

Comments on “2017 LTEP Part 2 – Outlooks and Forecasts”

(M of ENERGY, Draft as of August 25 2017)

Pg 9

- Disruptive technologies ‘could lead to lower than forecast demand’, but it should also be acknowledged that it is quite likely that achieving 2030 emission targets may require more increase in electricity supply than currently built in to the plan. The space-heating market will be challenging to address on a broad scale without the use of more electric heat-pumps. Neither wind nor solar is well suited to supply this end-use in Ontario’s climate, even with battery storage. As well, there are risks that biofuels and RNG may not materialize on the scale needed for the transportation sector.

Pg 12

- Bullet 3: “any new procurements would represent upward pressure on the total cost of electricity, including generation, transmission and distribution infrastructure.”
 - If this point is about building new supply because Ontario currently has a surplus, it also applies to conservation expenditures.
 - If it is that new supply would raise customer costs even if there were a corresponding demand that needed to be met, then it is not the total cost that matters, but the average cost. Rates will be at sufficiently high levels in the mid-2020’s that most new supply options will not push up the average cost or the \$/tonne CO2 reduced. Costs are not charged to customers until the generation is in service.

Pg 13

- The major lever on fuels use is cost to the customer after carbon emissions are priced in.

Pg 19

- Word smithing: substitution of new for old, ie RNG for conventional gas. (and in second bullet).

Pg 21

- Numbers on pie chart.

Pg 22

- As noted elsewhere, uncovered GHGs (31 Mt in 2020 according to MOECC) should be shown at the bottom of the plot, so the total emissions may be compared to the CCAP targets. Will get 152Mt in 2020, just below target and 125 Mt in 2030, *11 Mt above target*.
 - ‘...well below economy-wide CCAP target’ not correct.

Pg23

- Nothing wrong with saying that removing the last few Mts of gas-fired emissions in the electricity sector is more expensive than many other emission reduction measures, so can be deferred until those have been accomplished.

Pg 32

- The 8 per cent subsidy was the removal of the HST?
- OFHP provided an additional 17% to achieve a total reduction of 25%?

August 25, 2017