

RE: ECO Round 1 - Chapter Consolidated Comments

From: "Chatterjee, Jeet (ENERGY)" <jeet.chatterjee@ontario.ca>
To: "Campbell, David (ENERGY)" <david.campbell2@ontario.ca>
Cc: "Schlaepfer, Martin (ENERGY)" <martin.schlaepfer@ontario.ca>, "Armstrong, Hillary (ENERGY)" <hillary.armstrong@ontario.ca>, "Whittington, Matt (ENERGY)" <matt.whittington@ontario.ca>, "Coker, Meaghan (ENERGY)" <meaghan.coker@ontario.ca>
Date: Wed, 28 Feb 2018 19:12:32 -0500
Attachments: Round 1 - ECO 2017 Energy - Consolidated (final).docx (79.38 kB)

Hi David,

Thanks for these.

The two comments below were passed along to staff for the next round, and your comments on the chapters (with answers from staff where necessary) were consolidated into the attached version.

Let me know if you have any questions.

Thanks,
Deni

Jeet Chatterjee
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Ontario Ministry of Energy
P: 416-327-7025

From: Campbell, David (ENERGY)
Sent: February-28-18 4:02 PM
To: Chatterjee, Jeet (ENERGY); Whittington, Matt (ENERGY); Coker, Meaghan (ENERGY)
Cc: Schlaepfer, Martin (ENERGY); Armstrong, Hillary (ENERGY)
Subject: RE: ECO Round 1 - Chapter Consolidated Comments

Hi Deni,

See below for edits. MO is also comfortable with staff's suggested edits (and apologies if there is overlap that I have missed).

Two additional comments:

- Just to confirm, are these chapters also being review by other Ministries where relevant? I'm thinking particularly MOECC, Health (for Ch12), and MCSCS (for Ch14, re: PNERP).
- The ECO makes several references to the government's rebate equivalent to the provincial portion of HST, and generally refers to this as a subsidy by tax payers. While it's certainly true that this is a tax expenditure, it seems heavy-handed to consistently describe this as a subsidy, especially in the context of whether rate payers are paying the full or true cost of the electricity system. After all, it's not unusual for jurisdictions to make essential goods and services tax-free, such as for groceries. This is a repeating theme, so doesn't need to be included in this round of edits, but I'd appreciate if folks could think about whether there is constructive feedback we could offer the ECO on this for the next round.

I understand the time crunch on returning these edits. I am available by phone to discuss any of these, as necessary.

Thanks,
David

Section Page Paragraph	Language from Report	Comments
Ch1, P2, Para5	"As it ran up failed to make investments..."	Awkward phrasing
Ch1, P5, Para1	"It was successful in achieving the first two objectives."	Makes it sound like the GEA failed on its third objective by omission (economic development), but the footnote makes it clear that the third objective is simply out-of-scope for this report. Suggest amending in-text language to make it clear that the report is not suggesting Ontario failed on this objective.
Ch1, P8, Para1	"Any power that cannot be exported is simply wasted, or "curtailed"."	Is wasted an appropriate synonym for "curtailed"? Similarly the next sentence describes curtailed power as "thrown away".
Ch8, P2, Para2	"Until 2009, the Ontario Energy Board defined the average Ontario household used 1,000kWh/month."	Awkward phrasing
Ch8, P3, Graph and Note		Title and footnote seem in disagreement over whether these values are inflation-adjusted. Not sure if this is being fixed with an updated data set.
Ch8, P5, Para2 (in box)	"For those residents that don't quite qualify for the OESP program, the \$100M Affordability Fund..."	Is Affordability Fund targeted based on OESP qualification? I thought the cutoff was now based on HAP.
Ch8, P11, Para2	"However, according to the Ministry of Energy's analysis, which includes the average impact of bill savings due to the Industrial Conservation Initiative, Ontario industrial electricity rates were actually far more competitive."	Since this is based on current analysis (not a past year), this should read "rates are actually far more competitive" (not "were").
Ch12, P16, Para2	"Pollution is the largest environmental cause of disease and premature deaths in the world, causing an estimates 9 million premature deaths"	"estimates" should be "estimated"
Ch13, P4, Bullet 1	"using demand response to meet	"Heak" should be "peak"

	10% of Peak demand by 2025”	
Ch13, P6, Para3	“It is also a clear breach of the legal requirement that the Long-Term Energy Plan cover Ontario’s energy needs”	The ECO makes clear the disagreement over LTEP’s treatment of fuels, but this legal language is a different matter. Are we comfortable with the ECO using this language?
Ch14, P3, Para4	“Realistically, this process is, at best, decades away from having an operational facility that accepts high-level waste.”	Is this an accurate description of NWMO’s DGR timelines?
Ch14, P9, Para 3	“Ontario has made an all in, 50 year commitment to nuclear power, despite its environmental risks, without a full independent assessment of all relevant costs. ”	While the ECO has described costs that it feels were not adequately captured in reports so far, this statement is misleading as a part of the conclusion. It does not recognize extensive reporting by the FAO, OEB, or the various levels of independent oversight for refurb. Suggest instead the language, “and independent assessments have not all accounted for all costs deemed relevant by the ECO.”

From: Chatterjee, Jeet (ENERGY)
Sent: February 23, 2018 12:19 PM
To: Whittington, Matt (ENERGY); Coker, Meaghan (ENERGY); Campbell, David (ENERGY)
Cc: Schlaepfer, Martin (ENERGY); Armstrong, Hillary (ENERGY)
Subject: ECO Round 1 - Chapter Consolidated Comments

Hi Matt, Meaghan, and David.

Please find attached consolidated staff comments on the first batch of ECO chapters – 1, 8, 12, 13, and 14 (also attached). ECO was hoping for these comments by EOD yesterday.

Staff received 12 of 19 chapters in total. Staff are currently reviewing the remaining chapters, which will be coming in two subsequent batches.

Are these comments ok to share with the ECO?

Thanks,
Deni

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