



**Written submission from the
Canadian Manufacturers
& Exporters**

**Mémoire des
Manufacturiers et Exportateurs
du Canada**

In the Matter of

À l'égard de

**Bruce Power Inc. – Bruce A and B
Nuclear Generating Station**

**Bruce Power Inc. - Centrale nucléaire de
Bruce A et Bruce B**

Request for a ten-year renewal of its Nuclear
Power Reactor Operating Licence for the
Bruce A and B Nuclear Generating Station

Demande de renouvellement, pour une période
de dix ans, de son permis d'exploitation d'un
réacteur nucléaire de puissance à la centrale
nucléaire de Bruce A et Bruce B

Commission Public Hearing – Part 2

**Audience publique de la Commission –
Partie 2**

May 28-31, 2018

28-31 mai 2018



**Canadian
Manufacturers &
Exporters**



Senior Tribunal Officer,
Secretariat
280 Slater Street,
P.O. Box 1046, Station B,
Ottawa, ON K1P 5S9

Re: Bruce Power License Renewal

To Whom it May Concern:

On behalf of Canadian Manufacturers & Exporters (CME), I am writing in support of the CNSC License Renewal for the Bruce Power Nuclear facility and to request an opportunity to provide an oral presentation. Nuclear Power is the backbone of our electricity system and a reliable source of low-cost electricity, which is so vital to the competitiveness of the manufacturing sector. This license renewal is critical, not only for maintaining safe, low cost nuclear power from the Bruce Site, but also for generating significant opportunities for Ontario-based manufacturers which continue to be the backbone of the Ontario economy.

The three primary reasons for CMEs support for the Bruce Power license renewal including: the direct and indirect economic benefits that Bruce Power Generates, providing a source of competitively priced and reliable electricity to support manufacturers and strong leadership on health and safety.

Economic Benefits

In October, 2014 the CME jointly authored a study with the Provincial Building and Construction Trades Council of Ontario, Southwest Economic Alliance, Canadian Manufacturers & Exporters, The Society of Energy Professionals, the Power Workers' Union and Bruce Power that looked at the economic benefit of the Bruce investment program to the Province. Based on this report and the economics of the amended agreement announced recently, the economic benefits are significant:

- An estimated 18,000 jobs, directly and indirectly, and \$4 billion in annual economic benefit in Ontario through direct and indirect spending on operational equipment, supplies, materials and labour income.

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- An additional 3,000-5,000 direct and indirect jobs annually, contributing between \$900 million and \$1.2 billion in direct and indirect labour income annually, from the investment program (2020-36). In addition, between \$700 million and \$1 billion in direct and indirect annual economic benefit will be realized through the purchasing of equipment, supplies and materials.
- Over 90 per cent of Bruce Power’s spend takes place in Ontario and the company’s supply chain supports hundreds of businesses throughout the province. This investment program will also create significant, long-term opportunities for Ontario’s Manufacturing Sector.

Low-cost Reliable Power

A competitive and reliable supply of power is fundamental to a vibrant and growing manufacturing sector, which continues to be the economic engine of the Ontario economy. Bruce Power has been and must continue to play a moderating effect on Ontario’s electricity rate.

At 6.6 cents per kWh, the electricity supply from Power is among the most cost effective sources of supply delivered 24 hours a day, 365 days a year.

Table 2: Total Electricity Supply Cost

	% of Total Supply	% of Total GA	Total Unit Cost (Cents/kWh)
Nuclear	60%	40%	6.9
Hydro	24%	12%	5.8
Gas	6%	15%	20.5
Wind	8%	18%	17.3
Solar	2%	14%	48.0
Bio Energy	0%	0%	13.1

Source: Navigant

NB: Hydro excludes NUGs and OPG non-prescribed generation. Gas includes Lennox, NUGs and OPG bioenergy facilities. Percentage (%) of Total GA excludes CDM costs.

Strong Health & Safety Culture and Leadership



Bruce Power has demonstrated strong leadership in the area of health and safety as demonstrated by their safety record. For example, the most recent (2016) safety review by the CNSC of Canadian Nuclear Power Plants (NPPs) found that:

- There were no serious process failures at the NPPs.
- Radiation doses to the public were well below the regulatory limit.
- Radiation doses to workers at the NPPs were below the regulatory limits.
- The frequency and severity of non-radiological injuries to workers were very low.

Furthermore, there were no areas of the safety review that were deemed by the CNSC to be “below expectation” or “unacceptable”.

Beyond having a strong safety record, Bruce Power has been a strong champion of health and safety to others. By speaking at CME and other events and highlighting best practices, Bruce Power goes beyond compliance to serve as a leader to a broader community of stakeholders. The significance of this leadership cannot be understated. It is almost certainly a factor in why Ontario is a leading jurisdiction health and safety performance with lost time incidents in manufacturing declining dramatically over the last three decades.

Conclusion:

For the reasons outlined above, CME supports the Bruce Power License Renewal and hereby requests an opportunity to present further evidence and support to the CNSC.

Regards,

Senior Director, Program Development & Member Engagement
Canadian Manufacturers & Exporters