

News from the Society of Energy Professionals

**Power
Authority:
more
nuclear,
careful with
natural gas**



The Ontario Power Authority's Amir Shalaby spells out the Authority's recommendations to the Energy Minister.

Keep nuclear power in the mix, and be careful with natural gas, says Ontario's Power Authority.

The OPA delivered its long-anticipated "Supply Mix Advice Report" to the Minister of Energy last Friday, and released it to the public. It consists of advice and recommendations to the government of Ontario, given the government's stated objectives, including shutting down the coal-fired generators, and creating a "culture of conservation."

"The Power Authority had to work within the government's political objectives, and, given that reservation, they've done a good job of setting out a plan for the next 20 years," said Society President **Andrew Müller**. "While there are glaring holes in the Advice Report, they were created by the government, not the Power Authority."

"We need long-term, independent planning of the electricity system, and that's why we welcomed the creation of the Power Authority," he added. "But the OPA's constrained by Premier McGuinty's ill-conceived campaign promise to ban coal."

The Power Authority has set out a plan in which Ontario continues to rely on nuclear power for about half of its electricity generation, replaces coal-fired generators with natural gas ones, and relies on conservation and renewables to deal with projected increased demand.

The Energy Minister says the OPA's report will be posted on the Environmental Bill of Rights and Ministry of Energy websites for 60 days to provide Ontarians with an opportunity to review the report and provide input (n.b.: at time of writing, the author could not find the "opportunity" involved). The report and comments will form the basis of a Ministerial directive to the OPA on the optimal electricity supply mix. The OPA will then use the directive to create a blueprint that will detail the sources of Ontario's future energy supply.

In a subtle, but real, acknowledgement that the government's plans regarding replacing coal with gas are wrong-headed, the Power Authority warns against exposing the pricing system too heavily to the volatility of the natural gas market, and advises the government to keep the coal infra-

structure around, just in case. The goal of shutting them down in 2007/9 on its own relies on a very optimistic set of scenarios, it says.

Firstly, the procurement initiatives for replacement of supply capacity, which are the result of Government directives to the OPA, would need to materialize fully. Secondly, demand would need to remain essentially flat through intensive conservation efforts. Thirdly, major transmission investments and reconfigurations to bring new generation into the grid would have to be completed...

Given a relatively small supply margin ... and the relatively large combined risk of the many elements on which supply reliability depends, the replacement of the coal-fired plants needs to be monitored closely for circumstances that may require the development of alternatives.

The market for natural gas is too volatile for it to be a reliable fuel source for generation, the report says, and natural gas-fired generation should *not* be used for baseload power. It recommends that—once the current procurement processes (RFPs) are complete—Ontario add no

more than 1,500MW of natural gas generation to the portfolio, mostly for the relief of transmission bottlenecks.

Further, though the Power Authority's plan foresees natural gas-fired generation making up 27 per cent of Ontario's capacity, it also says they should only provide six per cent of the actual electricity produced.

"The OPA has produced an elegant plan, and reasoned it well, but there is a major flaw," says Müller. "Like the McGuinty government itself, the Power Authority appears to think it can operate the electricity system while ignoring Canada's free trade treaty obligations, specifically NAFTA."

The Authority's background findings state:

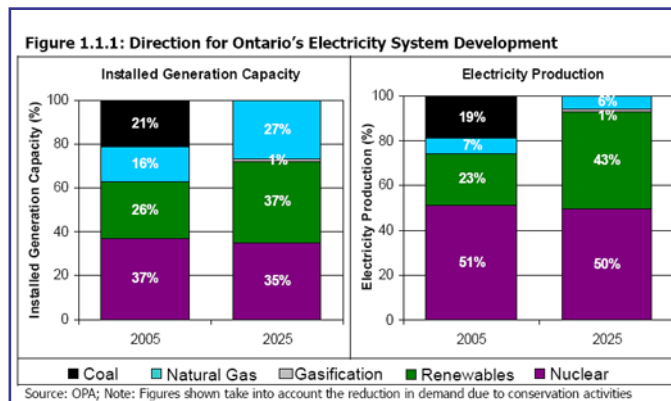
A new equilibrium exists in Ontario where market forces and centralized planning co-exist; the reintroduction of planning in 2004 follows the introduction of a market framework in 2002, and its subsequent partial curtailment in late 2002.

"This is what the government believes as well," says Müller, "but it's just wrong." He said NAFTA's market rules ensure that any plan which favours any form of generation that's more expensive than natural gas, no matter how renewable, or that requires private natural gas operators to serve as back-up for wind generation, as the OPA plan does, won't survive. "It will be litigated out of existence."

"The OPA's advice assumes that we don't have to worry about NAFTA's favouring of private enterprise over our long-standing tradition of public power," he added.

The Society has long said that the North American Free Trade Agreement's free-market rules will trump any plan for government regulation of the electricity industry, and has recommended that the government keep Ontario's electricity in public hands.

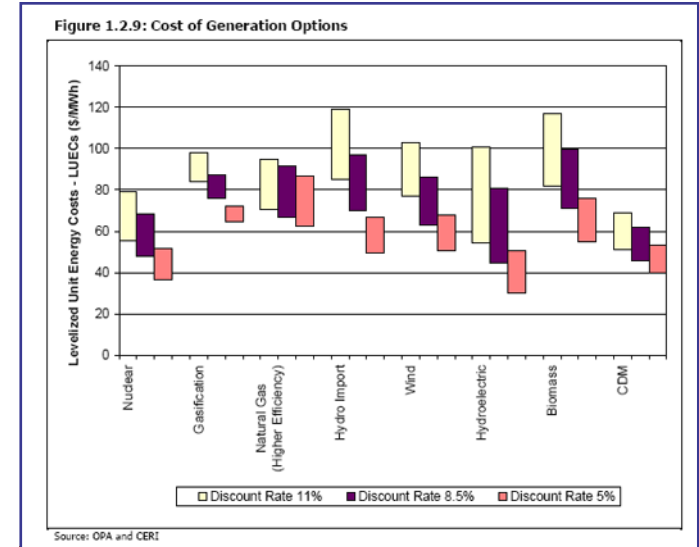
The OPA's ten-point "action plan" for electricity supply, stated briefly, follows:



The OPA's advice on the future supply mix depends heavily on renewables and conservation to avoid too much usage of natural gas.

- ◆ Be ready to adapt for futures different than predicted, and recognize that growth is uneven across Ontario, with growth in some parts of the GTA more than double the provincial average.
- ◆ Move immediately to capture conservation opportunities
- ◆ Acquire up to 5,000 MW of wind generation, especially for winter needs, and up to 1,500 MW of waterpower over the planning period, including small developments, upgrades to existing sites, and possibly pumped storage
- ◆ Seek to achieve full biomass and waste potential (estimated to be up to 500 MW), and full solar photovoltaics potential (up to 40 MW)
- ◆ Monitor closely coal replacement as it progresses, keeping the existing coal-fired generation infrastructure until coal replacement is complete and the potential future use of coal gasification is more certain.
- ◆ Use natural gas only in high-efficiency applications or applications where avoided costs are particularly high; do not use natural gas for baseload generation
- ◆ Continue talks with neighbours for potential firm purchases; explore imports; and assess transmission needs and the required associated permitting/approvals process
- ◆ Immediately investigate refurbishing existing nuclear units, and coordinate other resource availability to ensure adequate supply during the periods of nuclear refurbishment
- ◆ Initiate approvals and permitting as early as possible for new nuclear of up to 3,000 MW for a total capacity of up to 15,900 MW by 2025, with the additional capacity as a contingency
- ◆ Immediately initiate the development of transmission integration policies and plans, particularly as they relate to facilitating coal replacement, integration of renewables, and access to neighbouring markets

"This report is an important contribution, no doubt about it," said Müller. "If they were going forward with a public



The OPA's advice notes the differences in price for building different types of generation, while downplaying an equally crucial point: the "discount rate" for public borrowing (pink) makes construction of public assets cheaper than private ones.

system, and weren't being forced to implement the wrong-headed Coal Replacement Plan, their long-term view would be a great relief after the last 15 years of neglect and abuse."

Society: Nuclear? Think Canadian

The Society says the Ontario Power Authority's call for new nuclear generation facilities states what should be obvious.

"We've recognized all along that nuclear power is an irreplaceable part of Ontario's electricity mix," said **Andrew Müller**, Society president. "Ontario can't do without it, and I'm glad the OPA put it out there. The timelines for nuclear construction are very long; there's really very little time to waste."

"We've got two companies that can handle such projects, and we should let them get on with it."

Müller encouraged Premier McGuinty move fast on nuclear, and to think Canadian. "We've got a lot of Canadian expertise and experience available in CANDU technologies. Making use of it would be a good thing to do for the Canadian taxpayer."

Paul Hnatiuk, President of the Society of Professional Engineers and Associates, representing engineers and scientists at Atomic Energy of Canada, Ltd., agrees. "As the last six CANDU projects have shown, we can build reactors on-budget and on-schedule," he said.

He added that Canada needs the good jobs and skilled workers that the nuclear industry promotes. "A renewed commitment to CANDU technology will help maintain a highly skilled workforce of nuclear engineers, scientists, and technologists that will help to ensure self-sufficiency in electricity generation for years to come."

Board Highlights, December 6th

The Society's Executive Board met on December 1st at the Society office in Toronto.

Audit: Bruce Power Local VP **Rob Stanley** presented the Board with a draft audit plan, to be completed in time for the special Society Council meeting to be held in February (see *Newscast* 2005:05). An external auditor had been retained to carry it out for a fee of \$8,000. The audit will examine the Society's governance structure, including the performance and effectiveness of the Executive Committee and the Executive Board, and to evaluate whether Society expenditures are conducted in accordance with its own Control Framework.

The Board approved the audit plan, the results of which will be presented to the Board at its January meeting.

Environmental Assessment Campaign: The Society has been conducting a legal campaign to force the government of Ontario to subject its Coal Replacement Plan to a full environmental review. The Society alleges this is its obligation under the *Environmental Assessment Act* (see *Newscast* 2005:03).

Working with Willms and Shier Environmental Lawyers, the Society has intervened in a number of approvals processes around the Greenfield Energy Centre and the St. Clair Energy Centre, both natural gas-fired generators set to be built in the Sarnia area. President **Andrew Müller** reported that expenditures were projected to be approximately \$251,000, with \$83,000 in activities projected for the rest of the fiscal year (till March 31st).

The Board approved the expenditures.

PSAs/Offshoring: The Board directed Executive Vice President **Rod Sheppard** to continue to set up a regular cross-Local forum about purchased services (contracting



The Society's float for the Toronto Labour Day parade got the award for "best float" from the Toronto and York Region Labour Council.

out). Nuclear Safety Solutions representative **Jeremy McEachern** said the forum was an important way to keep tabs on what services Society employers are contracting out.

The Board also discussed the possibility that some employers, for example, CapGemini, seem likely to be exploring the offshoring of some Society work. That topic was also referred to Mr. Sheppard's forum.

Year-end Party: In discussing the arrangements for the Society's December 16th year-end event, Board Members raised a number of concerns regarding the liabilities that have accrued over the last few years on individuals and organizations sponsoring events in which alcohol is consumed. In ensuring that the celebrating involved will be both enjoyable and responsible, the Board made a number of additions to the arrangements for the event, including the substitution of a cash bar for the planned open bar.

(Members were informed of these changes on December 9th.)

Smart meters initiative still pretty sketchy

Society experts say the government's "smart meter initiative" is shaping up to be a hugely expensive, ineffective waste of time and money.

"This is quite the initiative," said Society Executive Vice President **Bill Jones**. "Not only is the government going to jack up the price at a time of day when most residential customers can't adjust their usage, but they're going to charge us for the equipment to keep track of it."

"This is exactly the wrong thing to do," he added. "If the government needs to be seen to be doing something, why not regulate increased appliance efficiencies and more stringent building codes, things that might actually accomplish something?"

In a recent conference on the smart meter implementation program and electricity pricing, organized by and for industries interested in profiting from them, participants had many more questions about the program than plans to implement. They say it will be some time before their questions are answered.

One conference presentation, given by a lawyer from a legal firm intimately involved in the restructuring of the electricity industry, consisted only of questions to which the firm needed answers.

The Government introduced legislation—Bill 21, the *Energy Conservation Responsibility Act*—on November 3rd. It sets up a "smart meter entity," that will administer the program under Cabinet direction. Sometimes referred to as "DataCo," it will also act as the central repository for all data collected by smart meters, which will be installed and owned by local distribution companies. DataCo may also collect data directly, in the case of customers of very *small* distribution companies.

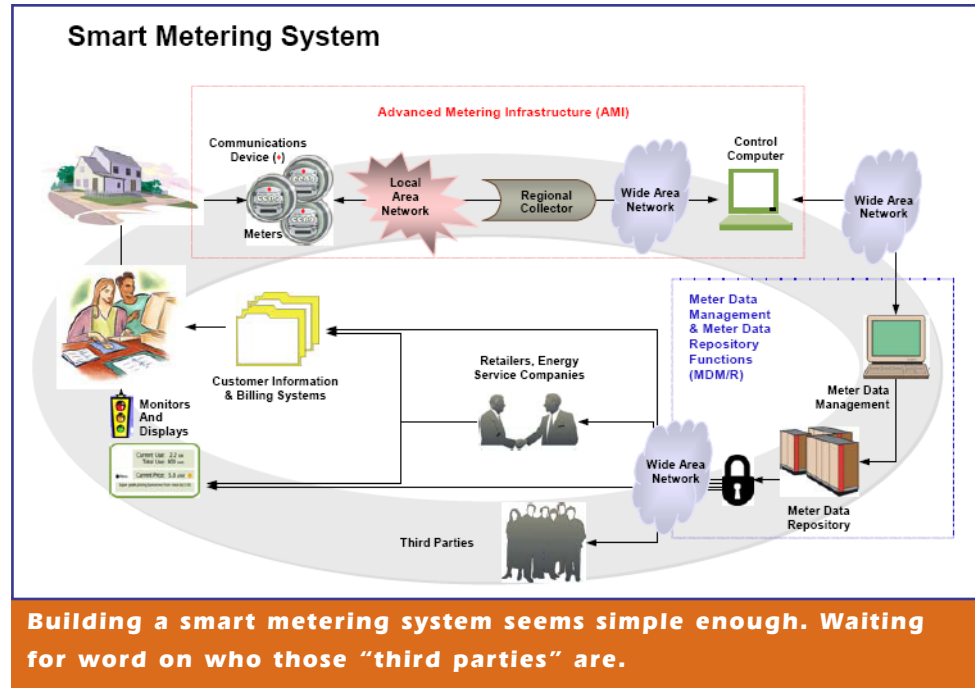
Due to the need for the data collected across the province to be useful, specifications for smart meters will be stringent, and will be set, again, by Cabinet. Local distribution companies will be able to pass on to ratepayers any "stranded costs" involved in removing "old-style" meters that have been recently installed.

The communications system involved will be "enormously complex," much more than many distribution companies can handle.

We do know that the initiative will use "time of use" metering, which will report hourly to DataCo for the assignment of the customers' rates. Those rates are currently slated to be as low as \$0.029 per kilowatt hour for

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Smart Metering System



Building a smart metering system seems simple enough. Waiting for word on who those "third parties" are.

electricity consumed during non-peak hours to as high as \$0.093 during daytime peak hours. There will also be a number of "critical days" of peak usage in which special, very high rates will apply, apparently as much as \$.93 per kilowatt hour.

Though the Energy Minister says the program will "giv[e] Ontarians the tools they need to make intelligent choices about electricity use and help them save money," it appears possible that the new "smart meters" will not be capable of two-way communication—customers will only learn how much electricity they've used and how much they've been charged for it *after the fact*—just like now. In programs where customers have had some success in reducing their bills, like the "pay-as-you-go" program undertaken in Woodstock, the meter includes a display which indicates in real time how much electricity is being used. (The government is unclear on whether the Woodstock program will be allowed to continue.)

The government estimates that the smart meters will cost \$1 billion, which will be billed to ratepayers. There was wide consensus at the conference that this is a vast underestimate, and that the real price could not possibly be known until the specifications for the meters are known. It could easily cost as much as \$10 billion to make this kind of technology work in every home in the province.

(One Society expert has estimated the "per-house" cost of the program at \$1,000, including the meter, installation, the communications, and the infrastructure required to process the mountains of data that will be collected. Replacement of these meters will be more frequent, because the rules for them recognize that failures are more common than for the old electro-mechanical type.)

Society experts also question the utility of the program. "The government's going to spend a billion of our dollars to shave 500 megawatts off peak usage, when the IESO

says they can shave 400 megawatts off peak load just by broadcasting a warning," Jones said. "It seems like a lot of money for a meagre result."

(Even worse, the expense might be counterproductive. Similar high-ratio time-of-day pricing in England in the 1970s spawned useless "peak chasing" that moved the peaks to night-time when they were even more expensive to serve. Then, prices had to be switched again, leaving all those who had over-invested in load shifting with a hefty expense and no savings!)

The Society's policy on conservation calls on the government to implement programs that don't punish consumers for usage they can't control—such as the cost of peak-hour electrical heating in low-cost housing. "The smart meter initiative smacks of penny-ante customer-gouging for small results," said Jones. "And it worries me greatly that there's been no announcement so far of how the government is going to cushion the poor from these high prices. They'll have almost no opportunity to adjust their use of electricity to avoid peak-hour pricing."

Happy holidays! (Society holiday closure)

This will be the last *Newscast* of the 2005 calendar year. The Society Principal Officers and staff would like to take this opportunity to wish all Society-represented employees and other readers of the 'Cast a joyous, fulfilling, and safe holiday season. We look forward to an active and productive 2006.

The Society office will be closed the week of December 26th, and will re-open at 8:30 a.m. on Tuesday, January 3rd, 2006.

Bruce Power local wins big in wage maintenance arbitration

Bruce Power management cannot count overtime hours when calculating "wage maintenance," says Arbitrator Frederick R. von Veh.

His ruling settles entirely in the Society's favour a grievance filed by the Bruce Power Local in May. The Local alleged that Bruce Power had improperly adjusted its "wage maintenance" policy—a policy by which employees are guaranteed a minimum of 35 (39 for some) "regular hours" (that is, hours Monday to Friday between 7 a.m. and 6 p.m. per week). Employees who don't receive those hours receive a "top-up" payment so their regular weekly wage is met.

Bruce Power had begun occasionally sending some employees home during their regular hours so they could call them back on overtime at night or on the weekend. They would then count those overtime hours in determining whether or not "maintenance" was due. In the grievance, Society Local Vice President **Rob Stanley** argued that Bruce Power management could not change this "long-standing practice" without bringing the subject up in collective bargaining.

Bruce Power and the Society inked a five-year renewal collective agreement in January. In April, management began to clip the maintenance payments from employees' paycheques, claiming they'd save \$350,000 to 400,000 a year.

"Our members are very pleased with the arbitrator's decision, as it clearly prevents the company from adopting their interpretation of wage maintenance," said Stanley. "Furthermore, it'll help our members in other locals where companies might try to establish the same practice."

The Bruce Power language on the subject is the same as that of other post-Ontario Hydro agreements.

Society Staff Officer **Mary Donnelly** argued the case in front of Arbitrator von Veh. Advising her at the hearing was Bruce Power Unit Director **Bob Wells**.

SPEA bargaining: pretty slow

The Society of Professional Engineers and Associates has spent 12 days in negotiation with the management of Atomic Energy of Canada, Ltd. Progress, says the bargaining team, has been slow.

SPEA signed a servicing agreement with the Society earlier this year, and is being assisted in bargaining by Society and IFPTE officials and staff.

AECL is in an excellent position right now. They've just won contracts in the refurbishing of Point Lepreau nuclear station in New Brunswick and two units at Bruce Power. The Ontario Power Authority has just recommended new nuclear build in Ontario—a tremendous opportunity for AECL.

SPEA is well positioned to make much deserved gains in terms of language and monetary items. SPEA has proposed language to improve the layoff process and members' entitlements on layoff, to enhance career and professional development, and to limit the use of contractors (currently there are 600 regular staff and 93 contractors), among other things.

Progress has been slow, with management steadfastly resisting contract improvements which it perceives as limiting "flexibility." Management's proposals are rich in opportunities for SPEA to discuss management decisions after they're made, but weak on any real power to influence those decisions.

SPEA members say AECL can't "improve customer satisfaction without also improving employee satisfaction," and SPEA's proposals are aimed at increasing their members' levels of job satisfaction. They say AECL should:

- ♦ Provide fair pay for good work
- ♦ Invest in the skills development of its engineers and scientists and
- ♦ Respect the balance between work, family and community

Society and IFPTE staff are assisting SPEA, helping to build a campaign encompassing member-based research, corporate leverage, action committees, and leadership building. Actions taken to date include:

- ♦ an open letter to the AECL CEO, signed by 85 per cent of SPEA members
- ♦ Sticker Day: "AECL - Powered by SPEA"
- ♦ Joint strategy sessions with the technicians' union (CRTT), also currently in bargaining with AECL, with observers on each other's teams
- ♦ Letters to the AECL Board of Directors, Point Lepreau, Premier McGuinty, federal MPs, and the Federal Minister

SPEA has 70 members who've volunteered for campaign leadership, in a bargaining unit that covers work locations in Mississauga, Pickering, Montreal, Bruce County, China, and Romania.

The SPEA bargaining team says SPEA wants the company to succeed, but they also say pursuing the systematic erosion of members' rights is not a good way to get them to "buy into the program."

"AECL needs labour peace as much as SPEA wants it," says SPEA President Paul Hnatiuk. "We're eager to work with the company to further our business, enhance AECL's reputation, and promote our standing with stakeholders and the public."

No quorum referendum

The referendum held to approve changes to the Constitution recommended by Society Council in October has failed to achieve quorum.

More than 5,900 ballots were mailed to members, and 1,741 were returned, or 31 per cent. Since the Society Constitution requires that referendum results cannot be counted unless at least 33 per cent of eligible voters cast ballots, no decision has been rendered as a result of the vote.

The next step, according to the Constitution, is the matters in question will be decided by the next Society Council.

Mandatory retirement to be banned

On December 12th, 2006, every Employer policy or collective agreement in Ontario that requires workers to retire at age 65 will be illegal.

Labour Minister Steve Peters hailed the legislation ending the practice, which passed Third Reading on December 8th. It's an "opportunity for workers," he said. "We've ended a great wrong in this province." It is "unfair," he said, to "insist" that workers "stop working" when they're 65.

He also admitted that the government estimates that about two per cent of workers will choose to work past the age of 65. A recent survey indicated Canadians are retiring, on average, at age 58.

The law changes the province's Human Rights Code to extend protection against discrimination on the basis of age to people 65 and older. But once someone turns 65, Peters said it's up to the employer whether to continue offering benefits such as dental and health care coverage. "We wanted to find the balance of ensuring that an individual had that opportunity to work beyond the age of 65, but as well making sure that we didn't place undue impact and burden on businesses." He didn't offer an

explanation as to how that assurance to employers *wouldn't* be discriminatory in itself.

These changes place organized labour in to a bit of a tight spot. The arguments are based on freedom of choice on the one hand and concerns about the potential impact on employees and pension provisions in the future. OFL president Wayne Samuelson hasn't minced words. "That's crap," he said. "I've been going to union meetings all my life ... and I've never seen anybody stand up and demand that they work longer. People want to work less. They want to have a decent pension. That's the debate we should be having."

Samuelson argues that the ban on mandatory retirement will inevitably result in employer demands to reduce or delay retirement benefits, and in reductions in public social benefits. He points to the U.S., where access to government benefits has been delayed to age 67.

Society locals must prepare for the ban, argues one Society advisor.

All Society locals will have to review and revise their retirement language (benefit policies/brochures/CA, etc.) and ensure that policies are modified to accommodate the new right to remain employed post-age 65. Of course, incentives to retire at or before 65 are always good, but employers may be tempted to 'performance manage' their long-service employees to encourage them to agree to leave rather than remain indefinitely.

New reactors fuel growing demand for uranium

There were 440 nuclear power reactors in 31 countries at the end of 2004. As of May 2005, there were 24 nuclear reactor plants under construction, another 40 being planned and 73 proposed, mostly in Asia and Eastern Europe.

Rising uranium prices have sparked a staking rush as a half dozen junior companies staked claims on a swath of land running from south of Calgary to the US border. Although there are surface indicators of uranium, prospectors have yet to find anything of significance.

OFL Convention: stop the spread of P3s

Public services in Ontario should not become the profit-making playthings of public-private partnerships, says the Ontario Federation of Labour.

At the OFL's "Action and Solidarity" convention held in late November, delegates called for an end to the spread of "P3s," various ways in which the government enlists the private sector to put the money up for public service infrastructure. In Ontario, the Liberal Government calls its



Wayne Samuelson (Steelworkers, centre) and Irene Harris (CUPE, r) will serve another two years as President and Secretary-Treasurer of the OFL, while Terry Downey (OPSEU, l) becomes OFL Vice-President, replacing Ethel Birkett-LaValley, who has retired.

flirtations with private capital "Alternative Financing and Procurement," but the OFL says AFPs look like P3s, walk like P3s, and are P3s, so no one should be fooled.

"Most P3s are simply a drain on the public purse," said Society President **Andrew Müller**, who led the 19-strong Society delegation. "We support in principle the OFL stand on the issue, though there may be some exceptions that turn out to be in the public interest."

One such exception, he noted, is Bruce Power, which is clearly such a partnership. "Thanks to the great work by our members and the other staff at Bruce Power, and good leadership, the facility has been a strong producer, contributing significantly to the reliability and security of our electricity supply."

But that success is unusual, he said. "Right now we're just glad it wasn't a partnership with Calpine."

P3s are a way for governments to borrow money without actually doing it themselves. In that way, public debt can be undertaken "off the books," with private sector partners doing the actual borrowing, and receiving payments from the public to do so. An OFL document said:

We already have plenty of examples of the problems created when public services are delivered privately-in Highway 407, in privatized operation of sewer and water services... and in the contracting out and privatization that has emerged in literally every area of public service in the province...

Earlier this year, OFL President Wayne Samuelson led a fact-finding tour to the United Kingdom, where Prime Minister Tony Blair has made P3s a cornerstone of how his country manages public services. Britain is important, they say, partly because the practice is well-entrenched, and partly because Premier McGuinty has sought out the advice of the Blair administration on P3s.

In Britain, says a report on the tour, the government is paying £137 billion for 677 projects worth £42 billion. By 2007, about one-fifth of Britain's public services will be

delivered by the private sector. Shockingly, hospitals built by the private sector cost up to five times as much as those built by the public sector. Schools operated privately are exempt from government control, even for delivering the government's curriculum!

The OFL's plan to combat further P3s involves:

- ◆ Forcing disclosure, through courts and the media, of the details of P3 deals signed by the Liberal government (P3 deals are often kept secret)
- ◆ Analyzing, costing, and publicizing every P3 deal
- ◆ Building public awareness of the implications of these deals

The government has made up its mind, says the OFL, and doesn't want to be confused by the facts. "Only well-informed public pressure [will] deflect the government now."

Labour Congress: Time for a new NAFTA debate!

Canadian Labour Congress President Ken Georgetti says it's time Canadians had a "serious debate" about free trade.

In an opinion piece published on December 1st in five major Canadian dailies, Georgetti said that if the lead negotiators of the Canada-U.S. free trade deal (CAFTA, the precursor of and model for the North American Free Trade Act) have admitted it was a mistake, Canadians should have another look at it. "Even the stars of the Mulrone team admit it publicly," he said. "The lead negotiators, Pat Carney and Derek Burney, concede that we surrendered too much for a dispute-settlement mechanism which is worthless: the Americans refuse to abide by it to settle the softwood lumber dispute."



OFL President Wayne Samuelson presents a "Solidarity Works" award to Anna Liu, for her accomplishments in youth activism and solidarity work as a member of the United Food and Commercial Workers and an OFL youth representative. Anna began working last month for the IFPTE as a Canadian organizer.

At the time the Canada-U.S. deal was signed, critics said all Canada got in exchange for a great deal of sovereignty over trade matters was a dispute-settlement mechanism. The negotiators of the deal, however, said Canada could count on it if the U.S. was treating us unfairly.

Georgetti says there are three things wrong with CAFTA and NAFTA:

- ◆ When free trade favours non-U.S. interests, Americans thumb their noses at it, as in the softwood dispute—Canada wanted protection from U.S. protectionism, but hasn't got it
- ◆ Canada has almost no control over its exports, and is vulnerable to rising energy costs, even though we have vast energy resources
- ◆ The "investors' rights" provisions of NAFTA put Canada on a one-way street toward the more unequal and insecure U.S. social model, and corporate control of our public services

"The US does not buy our exports to do us a favour: they buy them because they need them," he says. We should use that bargaining power to get a better deal. "NAFTA stands in the way of trading relationships that work for people, respect labour rights, and promote shared social progress."

Canadians should build a consensus on an alternative to NAFTA, and tell the U.S. we want to re-negotiate the deal, he said.

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