



**APPrO**

ASSOCIATION OF  
POWER PRODUCERS  
OF ONTARIO

June 19, 2006

**Re: OEB Cost Allocation Review for distribution File #: EB-2005-0317**

John Zych  
Board Secretary  
Ontario Energy Board  
P.O. Box 2319, 2300 Yonge Street  
Toronto, Ontario, Canada M4P 1E4  
boardsec@oeb.gov.on.ca  
CARreview@oeb.gov.on.ca

Dear Sir,

APPrO's letter on this matter dated June 6, 2006 stated:

*APPrO has not been involved in this proceeding before and was unable to consult fully with its members in the short time available for this process, between May 26 and June 6. We may therefore submit further comment at a later date, once there has been time for internal review.*

APPrO has now completed further internal review and wishes to supplement its previous comments, as follows.

**Rate Classification 9, Standby Power/Back-up Power**

**Hourly Generation Data**

In addition to the recommendations contained in APPrO's June 6, 2006 letter, APPrO recommends distributors be required to identify for each generator connected to its distribution system:

- whether the generator is intermittent (e.g., wind or photovoltaic generation) or controllable (e.g., gas-fired generation); and
- whether "behind-the-fence" generation is owned by the customers or by an entity other than the Standby Power/Back-up Power customer.

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## Hourly Load Data

APPrO also wishes to confirm its support for the requirement that the hourly load data for the Standby Power/Back-up Power rate class be provided for each customers, as indicated in the Board Staff Proposal. If any aggregation should be permitted, it should remain possible to differentiate customers by load characteristics (peak demand) in a manner that is comparable to the breakdown of the General Services classes.

Thank you for your attention to this matter,



Jake Brooks  
Executive Director

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