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November 30, 2005

**Delivered by Facsimile and E-mail**

Mr. John Zych  
Board Secretary  
Ontario Energy Board  
P. O. Box 2319  
27<sup>th</sup> Floor, 2300 Yonge Street  
Toronto, Ontario  
M4P 1E4

Dear Mr. Zych:

**Re: OEB File No. EB-2005-0463 – OEB and OPA Stakeholder Consultations on the Standard Offer Program for Small, Clean or Renewable, Embedded Generators**

I am writing to you as Chair of The Industry Task Force on Distributed Generation (the “DG Task Force”) with respect to the above-captioned matter. The DG Task Force is a volunteer group formed in March, 2003. It consists of approximately 70 industry participants, including consumers, generators, transmitters, distributors and retailers/marketers in the electricity and gas sectors, in an interest in furthering the establishment of policies that would create a supportive environment for the development of DG projects. Since its formation, the DG Task Force has met extensively with industry and public officials to work toward finding clear, simple and practical solutions to the barriers currently facing DG.

The DG Task Force has participated in various provincial and OEB initiatives as they relate to distributed generation. The DG Task Force commented on the Ministry’s discussion paper on Transmission and Distribution issued in December of 2004, and participated in the OEB’s proceeding on the 2006 Electricity Distribution Rate Handbook and the OPA’s Consultation on Procurement of Generation Resources.

On October 14, 2005, I wrote to you pursuant to the joint OPA/OEB letter of October 11, 2005 requesting expressions of interest in being involved in the OPA’s stakeholder sessions or the OEB’s consultations on the standard offer initiative, to confirm our interest in participating in both the OPA and the OEB stakeholder sessions and/or consultations. Since that time, we have participated in the OPA’s stakeholder consultation on the Standard Offer Process.

On November 17, 2005, the OEB released a Staff Discussion Paper on the development of a Standard Offer Program for embedded clean and renewable generation. Comments were due today. As the OEB is aware, I am counsel to several local electricity

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distribution companies in their 2006 Electricity Distribution Rate Applications. We have been working closely with our clients in recent weeks as they prepared their responses to OEB Staff and intervenor interrogatories arising out of their own rate applications and the OEB's generic Conservation and Demand Management proceeding. CDM responses were due last week, and interrogatory responses were due today from many distributors that have filed historical test year applications.

Unfortunately, it has not been possible to finalize the DG Task Force's comments on the Discussion Paper for today's deadline. If it is at all possible for the OEB, I would greatly appreciate being allowed until Monday, December 5, 2005 to submit those comments. If possible, I will deliver them prior to that date. I would appreciate your confirmation that this will be satisfactory to the OEB.

I thank you in advance for your consideration in this matter, and we look forward to providing you with our comments on the Staff Discussion Paper by Monday, December 5, 2005.

Yours very truly,

**BORDEN LADNER GERVAIS LLP**

*Original Signed by James C. Sidlofsky*

**James C. Sidlofsky**

JCS/dp

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