

25 Adelaide St. E  
Suite 1602  
Toronto ON, M5C 3A1



**APPrO**

ASSOCIATION OF  
POWER PRODUCERS  
OF ONTARIO

May 4, 2007

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
P.O. Box 2319  
2300 Yonge Street, 26<sup>th</sup> Floor  
Toronto ON M4P 1E4

Dear Ms. Walli

Re: EB-2006-0064 - OPG Response - OEB Draft Filing Requirements for OPG

The Association of Power Producers of Ontario (APPrO) wishes to provide its comments on the submission that OPG has provided to the Board on the above matter. We apologize for the late filing, but trust that the Board will consider APPrO's views nonetheless.

First, APPrO is of the view that OPG should be provided with some flexibility in meeting the filing requirements given that this is the first proceeding of this nature and OPG is a newly regulated entity.

Second, as an intervenor in Board proceedings, APPrO is interested in efficient and expeditious hearing processes. In the case of the above noted proceeding it is our view that this would be accomplished through a single proceeding to cover both the nuclear and regulated hydroelectric facilities rather than through separate sequential proceedings as proposed in the draft filing requirements.

Third, along the same lines, the filing requirements should lead to the production of evidence that is relevant and meaningful and avoid production of excessive amounts of information that is not useful and makes the review overly onerous. In particular, it is not clear that information regarding the prescribed facilities for the period prior to introduction of the current regulatory regime in April 2005 would be relevant to establishing new payment amounts.

Finally, APPrO supports OPG on the issue of disclosure of market information. It seems to us that the IMO spent considerable effort assessing the appropriate degree of generator disclosure and that the OEB should not require any information that goes outside of the IESO's generator disclosure requirements.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Butters', written over a large, light-colored oval shape.

David Butters  
President

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