

December 1, 2006

**VIA E-MAIL AND COURIER**

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: Board File Number EB-2006-0207:  
Board's Draft Report on the Ontario Power Authority's (OPA)  
Integrated Power System Plan and Procurement Process**

Ontario Power Generation Inc. (OPG) has reviewed the Board's Draft Report on the Review of the OPA's Integrated Power System Plan (IPSP) and Procurement Processes dated November 16, 2006 (the "Filing Guidelines"). OPG has previously commented on the Filing Guidelines on September 29, 2006, and in addition to those detailed comments we offer the following.

OPG is supportive of the principles within the Filing Guidelines. The Draft Report provides a solid foundation on which to conduct the IPSP review. However, OPG continues to be concerned with the level of detail and the amount of information that is being requested of the OPA as part of its IPSP submission. These requirements will present significant challenges to the OPA and to the various sources that the OPA will need to rely on.

As noted in our previous comments, given the limited time that the OPA has to develop the IPSP, these requirements appear onerous and may impact the OPA's ability to perform all of the supporting analyses in a timely manner, which could delay the preparation and filing of the IPSP. Further, being mindful of the Board's strong commitment to regulatory efficiency, OPG is concerned that extensive information requirements may result in an over-burdened hearing process.

If there are any questions with respect to the above comments or our earlier submission, please do not hesitate to contact me.

Yours truly,



Andrew Barrett

