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File No. TO209150002.2

BY COURIER AND RESS FILING

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
27th Floor
2300 Yonge Street
Toronto, Ontario
M4P 1E4

Dear Ms. Walli:

**Re: Ontario Power Authority (“OPA”)
Integrated Power System Plan and Procurement Process
Ontario Energy Board (“OEB”) File No. EB-2007-0707**

The Association of Power Producers of Ontario (“APPo”) submits the following list of issues that it would like to add to the issues list proposed by the OPA.

I. IPSP

1. The IPSP recognizes the contributions expected to be made by existing NUG facilities following the expiry of their present PPA terms. The OPA should be explicitly authorized to negotiate follow-on contract arrangements, where such follow-on contract arrangements are economically prudent and cost effective, well prior to the PPA term date in order to provide for the appropriate planning and commitments.
2. The OPA should take all reasonable steps, including making recommendations to the Government of Ontario and the Board, to bring about the legislative, regulatory and administrative changes necessary to facilitate the implementation of the IPSP, once approved. The first such recommendation should be made to the government by December 31, 2008. It should include, at a minimum, methods of streamlining and reducing the time required for local approvals (e.g. planning/zoning), provincial and federal approvals including the need to consult/gain acceptances for projects from First Nations in appropriate circumstances.
3. The IPSP introduces the concept of enabling lines, which are necessary to implement the supply choices outlined in the Ontario government’s supply directive, especially to access the proposed renewable generation projects. The IPSP also makes suggestions as to how such lines, and any required network upgrades, should be financed and who should pay

for them. The Board must either decide the issue of who should pay for such lines in its IPSP decision, or initiate immediately a second proceeding to determine this issue. In the event the Board were to decide the matter as part of its decision in this (IPSP) proceeding, section 1(2) of the *Ontario Energy Board Act* would apply. It states:


“In exercising its powers and performing its duties under this or any other Act in relation to electricity, the Board shall facilitate the implementation of all integrated power system plans approved under the Electricity Act, 1998.” (*our emphasis*)

The decision is critical to the planning and implementation of such enabling lines and cannot wait until the next IPSP, nor can it be properly decided on a case by case basis.

II. Procurement Process

The IPSP recognizes the contributions expected to be made by existing NUGs following the expiry of their present PPA terms. The NUGs shall be considered sole proponents for purposes of the Procurement Process.

Yours sincerely,



Tom Brett
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