

13 November 2008

Ms. Kirsten Walli, Board Secretary  
Ontario Energy Board  
P.O. Box 2319  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, ON  
M4P 1E4

Dear Ms Walli:

**Re: EB-2008-0352 CDM Input Assumptions Consultation**

I write on behalf of the Green Energy Coalition (GEC) in response to the Board's invitation to comment dated November 4<sup>th</sup>, 2008.

GEC has no objection to the *concept* of utilizing common input assumptions for LDC and OPA CDM. However, we wish to be clear that our support for the concept should not be taken as an endorsement of any particular assumptions that OPA is utilizing. With respect to the particular assumptions (apart from avoided costs), we are not currently in a position to evaluate their adequacy as the review of measure and program input assumptions is too detailed a matter to have been included in our work for the IPSP process and there has been no other funded process to support such a detailed review. In this regard we are in receipt of Mr. Shepherd's comments on behalf of the School Energy Coalition. We agree with Mr. Shepherd's observation that the Board must be satisfied with the acceptability of the assumptions and that at present there is no evidentiary basis for such a finding. Accordingly, we agree that a process needs to be put in place for the vetting of those assumptions.

Further, our support for the concept is premised on the Board's indication that it will not utilize OPA avoided costs pending the outcome of the IPSP review which is expected to cover that matter. GEC has grave concerns about inadequacies in OPA's avoided costs and this is a matter that needs to be informed by the broader issues associated with the IPSP process.

Sincerely,



David Poch