

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
PO Box 2319
2300 Yonge St, Suite 2700
Toronto ON
M4P 1E4

December 8, 2011

Dear Ms Walli,

RE: Renewed Regulatory Framework for Electricity EB2011-0043; EB2010-0378; EB2010-0379

Further to your letter, we are writing to clarify our position regarding intervenor status and cost eligibility for the above noted matter further to the Board's Rules of Practice and Procedures.

With respect to the intervention and as previously stated, APAO represents the collective voice of the biogas industry from farmers, technology suppliers, financial and other institutions. No other group advocates on behalf of this technology and its specific issues. Biogas generators are typically smaller scale (i.e. 500kW), synchronous connections to the electrical grid at the distribution level. Biogas projects are prevalent in rural areas and help to improve power quality and reliability of supply in these local areas.

While APAO is a member of Ontario Sustainable Energy Association (OSEA), we have different expertise and perspective. OSEA relies on the APAO to provide content related to its work on biogas, in webinars, written communications, and online. OSEA's focus is predominantly on solar and wind technologies, reflecting its membership profile. We plan to coordinate our intervention with OSEA, and support messages where appropriate. However, we anticipate the overlap will be small in scope.

While some of our members are independent power producers, they are not members of APPrO, nor is our association. Given that APPrO members are much larger generators, we do not feel our members' voices would be heard under the APPrO banner for these related discussions.

Further, although there may be common interests between our members and those of OWA, we recognize there are distinct differences and that we each would bring forward in representing our memberships views and concerns.

APAO will make every effort to collaborate with OSEA, APPrO and OWA to minimize duplication and overlap of input thereby respecting the efficiencies and due diligence of this process. Given the uniqueness of biogas as generators and consumers of electricity, our biogas expertise and direct knowledge of the concerns for this sector, it is for these reasons that we ask you to further consider our request for intervenor status and cost eligibility.

Thank you again for your consideration on this matter.



Jennifer Green, Executive Coordinator, APAO