



July 8, 2015

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

Re: Ontario Power Generation Inc. Disposal of Account Balances
AMPCO Final Submissions
Board File No. EB-2014-0370

Dear Ms. Walli:

Attached please find AMPCO's final submissions in the above proceeding.

Please do not hesitate to contact me if you have any questions or require further information.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Adam White". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Adam White
President
Association of Major Power Consumers in Ontario

Copy to: Ontario Power Generation Inc.

EB-2014-0370

Ontario Power Generation

**Application to dispose of balances in certain
deferral and variance accounts**

- Ontario Power Generation Inc. (OPG) filed an application with the Ontario Energy Board (OEB) on December 18, 2014 under section 78.1 of the Ontario Energy Board Act, 1998, S.O. 1998, c. 15, (Schedule B), seeking approval for an order or orders related to deferral and variance accounts, including disposition of account balances as at December 31, 2014.
- On June 16, 2015, Ontario Power Generation Inc. (OPG) filed a settlement proposal related to deferral and variance accounts, including disposition of account balances as at December 31, 2014.
- The settlement proposal reflects a partial settlement with all issues settled by the parties except for one unsettled matter in the proceeding that applies to the balances in several deferral and variance accounts. The unsettled matter concerns whether certain amounts recorded in the period January 1, 2014 to October 31, 2014 in all accounts except the Pension and OPEB Cost Variance Account are appropriate given the OEB's decision to make 2014-2015 payment amounts effective November 1, 2014.
- The OEB considered the settlement proposal and the OEB staff submission filed on June 18, 2015, and approved the settlement.¹
- OPG has recorded amounts in the accounts calculated with reference to EB-2010-0008/EB-2012-0002. Some of the intervenors in this proceeding are of the view that the amounts should be calculated with reference to the revenue requirement determined in EB-2013-0321.
- AMPCO has reviewed the Final Argument of the School Energy Coalition ("SEC") in this proceeding. AMPCO supports and adopts SEC's argument.
- AMPCO agrees the entire amount of the \$263 million under review in this case was included by the Board in the 2014/2015 revenue requirement that was used to determine 2014/2015 payment amounts. AMPCO submits that if the amount is included in the revenue requirement, it should not also be included in the deferral and variance accounts. AMPCO agrees that to allow recovery of the \$263 million through deferral and variance accounts, in addition to including it in revenue requirement amounts to double counting.
- Costs:
AMPCO requests that the Board order payment of our reasonably incurred costs in connection with our participation in this proceeding.

¹ PO#8