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5 July 2017

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

Dear Ms. Walli:

Re: EB-2017-0127 / EB-2017-0128
Mid-term Review of the Demand Side Management (DSM) Framework for Natural Gas Distributors

We are counsel to the Association of Power Producers of Ontario (**APPrO**) in the above-mentioned proceeding (the **Proceeding**). APPrO intends to participate in the Proceeding and requests cost award eligibility pursuant to section 3.03(a) of the Board's *Practice Direction on Cost Awards*.

APPrO is eligible to seek a cost award because APPrO primarily represents the direct interests of consumers in relation to services that are regulated by the Board. APPrO's members include more than 100 companies involved in the generation of electricity in Ontario. Most of APPrO's gas-fired generator members are large volume customers and are some of the largest customers within Enbridge Gas Distribution Inc.'s (**Enbridge's**) and Union Gas Ltd.'s (**Union's**) franchises. These large volume customers individually contract for significant quantities of distribution services from Enbridge and Union. Within the Enbridge system, APPrO members predominately contract for distribution service under Rate 125. Within the Union franchise, gas-fired generators primarily contract for distribution services under Rate 20, Rate 25, and Rate 100 in Union North, and T2 in Union South. As a result, APPrO's members have a direct, significant and unique interest in the Proceeding that may be of interest to all customers.

The Board has deemed APPrO an intervenor eligible for costs in previous proceedings. These proceedings include, among others: Enbridge's 2014-2018 IRM Proceeding (EB-2013-0459); Union's application for an order or orders approving a one-time exemption from its approved rate schedules to reduce certain penalty charges applied to direct purchase customers who did not meet their contractual obligations (EB-2014-0154); Union's 2013 Rebasing Proceeding (EB-2011-0210); Union's 2014-2018 IRM Proceeding (EB-2013-0202); and Union's and Enbridge's applications for approval of their 2015-2020 DSM plans (EB-2015-0029/EB-2015-0049). APPrO

believes it is appropriate for the Board to award APPrO costs in the context of the Proceeding as well.

APPrO requests that further communications with respect to the Proceeding be sent to the following:

Association of Power Producers of Ontario

25 Adelaide St. East Suite 1602
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Attention: David Butters, President
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Yours very truly,



Lisa (Elisabeth) DeMarco