



December 19, 2018

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. Recovery of Deferral and Variance Account Balances
AMPCO Comments on Draft Issues List
Board File No. EB-2018-0243

Dear Ms. Walli:

In Procedural Order #3, the Board made provisions for submissions on the draft issues list at Schedule A.

AMPCO submits a new issue should be added to the Issues List that addresses the appropriate future schedule for clearance of deferral and variance accounts. AMPCO suggests "What is the appropriate schedule for clearance of each of the Applicant's deferral and variance accounts going forward?"

At the Technical Conference OPG indicated that it OPG's s proposed that it will not seek further DVA recovery until its next rate application.

MS. GIRVAN: And the relevance of my question is because in H-CCC-5, it sets out the proposed riders going up to 2021. I just wanted to make sure that there wasn't going to be another application that would add to those later years, and I think you have confirmed that for me. So what we see here is the final riders that you are proposing up to 2021, is that correct?

MS. MacDONALD: Sorry, could you repeat the question?

MS. GIRVAN: Yes. I am just looking at this chart and it sets out the riders going forward to 2021. What you told me earlier was that you are not intending on applying in that period for recovery of anything. I guess any further recovery of amounts would start in 2022, is that correct?

MS. MacDONALD: Yes, at this point in time, it is not OPG's intention to file for DVA recovery prior to its next rate application.

Given the substantial balances that are likely to accrue between now and OPG's next rate application, AMPCO submits the Board should consider the timing of future account dispositions in this proceeding. Historically, OPG has cleared these accounts on a regular basis.

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

Sincerely yours,

(ORIGINAL SIGNED BY)

Colin Anderson
President
Association of Major Power Consumers in Ontario

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