



VIA RESS AND COURIER

March 17, 2009

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

Dear Ms. Walli:

**Re: Ontario Power Authority 2009 Expenditure and Revenue Requirement
AMPCO's Submission
Board File No. EB-2008-0312**

In accordance with Procedural Order No. 2 dated March 6, 2009, attached please find AMPCO's submission on the overall budget level and Issue 6.4 for the above proceeding.

Should you have any questions or require further information, please do not hesitate to contact me.

Sincerely yours,

ORIGINAL SIGNED BY

Adam White

Copies to: Miriam Heinz, Ontario Power Authority
Intervenors

Association of Major Power Consumers in Ontario
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IN THE MATTER OF section 25.20 and 25.21 of the
Electricity Act, 1998;

AND IN THE MATTER OF a Submission by the Ontario
Power Authority to the Ontario Energy Board for the review
of its proposed expenditure and revenue requirement for
the year 2009.

**FINAL SUBMISSION OF THE ASSOCIATION OF
MAJOR POWER CONSUMERS IN ONTARIO (“AMPCO”)**

March 17, 2009

A. The Application

1. The Ontario Power Authority (OPA) filed an application with the Ontario Energy Board on November 2, 2008 for its proposed 2009 expenditure and revenue requirement for review and approval pursuant to subsection 25.21(1) of the Act.
2. The Board issued a Notice of Application on November 28, 2008. In Procedural Order No. 1 dated December 17, 2008 the Board approved AMPCO as an Intervenor and found AMPCO eligible for a cost award.
3. AMPCO submitted Interrogatories on February 3, 2009 and received Interrogatory Responses on February 17, 2009.
4. AMPCO participated in a Settlement Conference on February 23, 2009. The OPA filed a Settlement Proposal with the Board on February 27, 2009.
5. Settlement was achieved on all issues with the exception of **Issue 6.4 - Workforce Hiring Practices**.
6. As part of the Complete Settlement of Issues 1 through 6.3, it was agreed that Energy Probe and AMPCO will make written submissions in this proceeding that will address the overall trend of the budget and will request that the Board provide direction to the OPA regarding the budget for 2010, and other future years. The OPA will have the right to reply to these submissions.

B. Issue 6.4 - Workforce Hiring Practices

Has the OPA responded appropriately to the expectation of the Board Panel in respect of workforce hiring practices as stated on page 11 of the Decision and Order in the EB-2007-0791 proceeding?

1. The Board Findings on page 11 of the EB-2007-0791 Decision and Order dated May 15, 2008 are:

“...the Board has noted that the OPA’s 2008 budget reflects a substantial increase in its overall workforce – it increases from 137.0 in 2007 to 183.8 Full Time Equivalents in 2008. In the CDM area specifically, the OPA is doubling its workforce to 66.2 Full Time Equivalents. The Board has also noted from OPA’s testimony that the OPA is currently not in a position to forecast its workforce requirements and acknowledged that in the future its workforce could be reduced. The possibility for a reduction in the future has not altered the OPA’s practice in continuing to augment its existing workforce with full-time permanent employees. While the Board accepts the OPA’s budget associated with its workforce for the 2008 year, in light of the uncertainties for future workforce requirements acknowledged by the OPA, the Board expects the OPA to review its hiring practices for 2008 and to fully justify increases to its permanent full-time workforce in its 2009 fees application.”
2. In light of the year to year increases in the OPA’s actual annual operating costs and increases in total FTEs, AMPCO submits that the Board should continue to request that the OPA fully justify increases to its workforce in its 2010 fees application and future applications.

3. AMPCO has reviewed the submissions of Energy Probe that address Issue 6.4 and makes no additional submissions on this Issue.

C. Costs

AMPCO submits that it has participated responsibly in this proceeding and sought to minimize costs by limiting its involvement to matters that are relevant to AMPCO. AMPCO cooperated with other intervenors of like interests where appropriate in order to avoid duplication on submissions before the Board.

AMPCO respectfully requests that it be permitted to recover 100% of its reasonably incurred costs in this proceeding in accordance with the Board's Practice Direction on Cost Awards.

ALL OF WHICH IS RESPECTFULLY SUBMITTED THIS 17TH DAY OF MARCH 2009.

ORIGINAL SIGNED BY

Adam White
C/O AMPCO