

April 27, 2007

Re: Hydro One Networks Application under Section 92 for leave to construct the Bruce to Milton Transmission Corridor (EB-2007-0050)

Kirsten Walli Board Secretary Ontario Energy Board P.O. Box 2319, 2300 Yonge Street Toronto, Ontario, Canada M4P 1E4 boardsec@oeb.gov.on.ca

Dear Ms Walli,

APPrO would like to request intervenor status in the above-noted proceeding.

APPrO is a non-profit organization representing electricity generators in Ontario. Our members produce nearly all the power generated in Ontario from facilities of many types including gas-fired, hydro-electric, nuclear and wind energy. APPrO members collectively represent a large amount of capital invested in the provincial energy system, measured in the billions of dollars. In addition, our members are involved in the development of new generation, and are thereby concerned about the conditions under which any potential future generation facilities would operate. We currently have more than 100 members, of which 89 are corporate members. In addition to generators, our membership includes developers, equipment suppliers, service suppliers, consultants and individuals in a variety of professions and trades concerned with power generation.

Our members are directly affected by the Bruce to Milton proceeding because many of them have or would like to build generation facilities in the Bruce area. Current transmission facilities are not sufficient to carry the output of all those generation plants that could reasonably be expected to come to fruition if transmission were available.

As an organization, APPrO has participated in numerous proceedings before the Ontario Energy Board, and tried to present its case in a way that is mindful of the public interest, and of assistance to the Board in its deliberations.

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APPrO expects to seek an award for costs incurred in this proceeding, on the basis that it represents a class of customers, a large number of whom could not participate or be represented otherwise. The organization is eligible for an award of costs because, in a hearing like the present one, it represents the interests of a distinct stakeholder group, significantly affected by the outcome, which is not represented by any of the current intervenors. APPrO respectfully suggests it is eligible for costs pursuant to sections 3.03(a), 3.03(b) and 3.06 of the Board's Practice Direction on Cost Awards.

Although generators are not generally seen as consumers or customers of electric power services, with respect to transmission connections, generators are in fact customers.

At this time, we do not have a preference between a written or oral hearing.

For purposes of communication, we would appreciate it if you would send correspondence to the following three email addresses:

Jake.Brooks@appro.org
David.Butters@appro.org and
Tom.Brett@gowlings.com

Thank you for your attention to this matter,

Jake Brooks

Executive Director

Cc Mr. Glen MacDonald Senior Advisor, Regulatory Affairs Hydro One Networks Inc. Regulatory@HydroOne.com

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