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APPRO

ASSOCIATION OF
POWER PRODUCERS
OF ONTARIO

November 8, 2010

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

Dear Ms. Walli,

**Re: EB-2010-0300: An application by Union Gas
Limited for an order or orders pre-approving the cost consequences
associated with three long-term natural gas transportation contracts.**

As a pre-approved intervenor, The Association of Power Producers of Ontario (APPRO) is requesting that it be eligible for the reasonably incurred costs of its participation in the above noted Proceeding.

APPRO is a non-profit association that advocates on behalf of Ontario generators in a number of settings, including regulatory proceedings before the Board. APPRO members represent more than 98% of Ontario's generating capacity and are active in every generation technology: gas, wind, cogeneration, district heat and power, nuclear, hydroelectric, coal, solar, geothermal, energy from waste and fuel cells.

Gas-fired generators are an increasing component of the Ontario electricity system, and are both significant users of natural gas (current estimates that gas-fired electricity generators consume approximately 24% of Ontario's gas consumption, and that this will rise to more than 30% once the gas-fired generation build-out is complete), and major customers of Ontario regulated gas utilities. Almost all of Ontario's current or contemplated natural gas fired generation capacity is owned and/or operated by APPRO member companies. They are directly affected by the availability of supply, transportation and other gas services and the rates that are charged. APPRO submits that as the representative of a significant customer class, it can and does provide a valuable public interest contribution to the Board's deliberations in natural gas-related matters.

It is for similar reasons that APPrO has actively participated in the past in the Natural Gas Electricity Interface Review (EB-2006-0338), the Incentive Regulation Framework for Natural Gas Utilities (EB-2006-0209), and the Gas Natural Gas Storage Allocation Policies process (EB-2007-0724/EB-2007-0725), and the Storage and Transportation Access Rule (EB 2008-0052), Union rate hearing (EB-2009-0275) and the recent Natural Gas Market Review (EB-2010-0199), among others.

I am confident that APPrO's participation in those proceedings has been of assistance to the Board.

Sincerely,

A handwritten signature in black ink, consisting of a large, stylized 'D' followed by a horizontal line and a small flourish.

David Butters
President & CEO