

ONTARIO ENERGY BOARD

IN THE MATTER OF sections 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 requirements and
the fees which it proposes to charge for the year 2011;

NOTICE OF MOTION

**(Motion for Review of Board Decision on Cost Eligibility issued December 13,
2010)**

THE INTERVENOR, Ontario Sustainable Energy Association (“OSEA”), will make a motion pursuant to Rules 7.01, 8.02, 41, 42, and 44 of the Board’s Rules of Practice and Procedure, for review of the Board’s Decision on Cost Eligibility (Cost Eligibility Decision) issued on December 13, 2010, in relation to OSEA’s application to be considered eligible for an award of its costs in this Proceeding (OSEA’s Cost Eligibility Claim).

PROPOSED METHOD OF HEARING: OSEA requests an oral hearing and that the hearing of this motion be combined with the hearing of the motion for review filed by OSEA in EB-2010-0331 and EB-2010-0332 on the basis that there is a substantial overlap of the grounds in each motion for review.

THE MOTION IS FOR:

1 An Order,

- (a) that OSEA's Cost Eligibility Claim complies with the Board's criteria for awarding costs in the Board's Practice Direction on Cost Awards (Practice Direction)
- (b) varying the Cost Eligibility Decision to determine that OSEA is eligible for a cost award in this Proceeding
- (c) abridging the time for filing and serving this motion
- (d) costs of this motion, and
- (e) such further and other relief as OSEA's Counsel may request and this Board deem just.

THE GROUNDS FOR THE MOTION ARE:

1 OSEA is an intervenor in this Proceeding and should be eligible for an award of costs in accordance with Rule 41 of the Board's Rules of Practice and Procedure (Rules) and in accordance with the Practice Direction.

2 OSEA asks the Board to extend or abridge the time limit for submitting such a motion for review in accordance with Rule 7.01. The Cost Eligibility Decision was released in mid-December prior to holidays and at a difficult time to obtain instructions. OSEA acted in as timely a manner as possible to bring this motion.

3 The Board erred and exceeded its jurisdiction in determining that OSEA is not eligible for a cost award in the Cost Eligibility Decision, in breach of the

Board's duty of fairness to OSEA and in wrongful denial of OSEA's legitimate expectations that the Board will comply with its own rules and principles concerning cost awards.

4 The Board arbitrarily determined that OSEA is not eligible for a cost award in this Proceeding on three grounds:

- (a) OSEA's members include generators, a group that is specifically excluded from cost award eligibility, except in special circumstances;
- (b) OSEA does not represent the direct interests of consumers; and
- (c) OSEA does not primarily represent a public interest issue.

1 OSEA DOES NOT REPRESENT A GROUP OF GENERATORS

5 Rule 41 and criterion 3.05 (b) from the Practice Direction provide that the following parties are not eligible for costs:

transmitters, wholesalers, generators, distributors, and retailers of electricity, either individually or in a group.

6 The logic for excluding generators is that they can recover their prudently incurred costs through the regulatory process in their rates, fees or through the cost of doing business. This is not the case for OESA's members.

7 Criterion 3.05(b) from the Practice Direction excludes "generators...in a group", or a group of generators from being eligible for a cost award. As OSEA

has consistently indicated in its submissions, OSEA is not a group of generators. OSEA has members that propose to generate renewable energy under a procurement contract granted by the OPA, just as the Canadian Manufacturers & Exporters (CME) has members that are entitled to apply to become generators under the OPA FIT program, among other procurement programs.

8 We further submit that the Board should make an exception to its cost eligibility criteria for OSEA, based on the unique circumstance that OSEA has few generator members.

9 To this end we provide the following information supported by the attached table at Appendix A. Only six of the over 75 organizational members of OSEA, representing thousands of individuals, are generators. These six have a combined in-service capacity of just over 20 MW with the one single member accounting for 18.5 MW (Sky Power Limited) and a second accounting for 1.6 MW (Schneider Power). These two members provide valuable capacity building support to OSEA members who are seeking to become generators and should not be viewed as the reason to exclude OSEA for eligibility in the Practice Direction.

10 Moreover, of the other four members who are generators, one is a religious community, another is a non-profit co-operative organization, another third generates electricity for educational and testing purposes and the fourth is a family farm based initiative for a 10Kw solar project. While 14 other members are hoping to become generators in the future – only three specific projects have

been identified: two are 10 MW and one is 67 MW. It will be some time before these projects will be in-service.

2 OSEA REPRESENTS DIRECT INTERESTS OF CONSUMERS

11 Please refer to paragraphs 8 to10 of the motion for review filed by OSEA in EB-2010-0331 and EB-2010-0332 for OSEA's arguments respecting OSEA's representation of the direct interests of consumers.

3 OSEA UNIQUELY REPRESENTS THE PUBLIC INTEREST OF RENEWABLE ENERGY

12 Please refer to paragraphs 11 to 15 of the motion for review filed by OSEA in EB-2010-0331 and EB-2010-0332 for OSEA's arguments respecting OSEA's representation of the public interest of renewable energy.

3.1 OSEA'S UNIQUE PERSPECTIVE ADDS VALUE

13 Please refer to paragraphs 11 to19 of the motion for review filed by OSEA in EB-2010-0331 and EB-2010-0332 for OSEA's arguments respecting the added value that OSEA brings to proceedings before the Board.

4 STATUTES TO BE RELIED ON:

- (a) Ontario Energy Board Rules of Practice and Procedure
- (b) *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15 (Schedule B),
and
- (c) *Statutory Powers and Procedure Act*, R.S.O. 1990, c. S.22.

THE EVIDENCE TO BE USED AT THE MOTION:

- 14 Materials in the record of this Proceeding
- 15 Appendix A herein, and
- 16 Such further and other evidence as Counsel may request and the Board deem just.

January 10, 2011

WILLMS & SHIER
ENVIRONMENTAL LAWYERS LLP
4 King Street West, Suite 900
Toronto, Ontario M5H 1B6

Cherie Brant
LSUC # 48242S

Tel: 416-862-4836
Fax: 416-863-1938

Counsel for the Moving Party, OSEA

TO: **ONTARIO ENERGY BOARD**
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto ON M4P 1E4

Attention: Board Secretary
Filings : www.errr.oeb.gov.on.ca
E-mail: Boardsec@oeb.gov.on.ca

Tel: 1-888-632-6273 (toll free)
Fax: 416-440-7656

AND TO: **ALL REGISTERED INTERVENORS**

APPENDIX A

Members of the Ontario Sustainable Energy Association

Member	Description	Generator Now	Future Generator
AgriEnergy Producers' Association of Ontario (APAO)	The main objectives of APAO are to facilitate the exchange of information and sharing of tools amongst individual members while continually promoting the development of the agri-energy sector in Ontario.	No	No
3G Energy Corp.	We are renewable energy project consultants focusing on building megawatt scale wind and solar farms for commercial, institutional investors and large emitters.	No	No
A&T Energy	A&T ENERGY will generate sustainable energy through a 100% local community owned business, contributing to the transition to 100% sustainable energy.	No	Yes
Advanced Green Technologies	Advanced Green Technologies provides renewable energy solutions by supplying the products and support for installations of the most advanced and cost effective green solutions for customers.	No	No
AgEnergy Cooperative	AgEnergy Co-operative is an independent, member-owned co-operative formed in 1988 to provide energy products and services to its members. Since being established the Co-operative has grown into Canada's largest farm energy co-operative. The membership now represents 2/3 of all greenhouse natural gas consumption in the province. That adds up to approximately 1/3 of all the heat consumed by all Ontario farm operations. Projects: AgEnergy offers a Natural Gas Program and Electricity Program for the sale of Gas and Electricity through long-term contracts. They offer load profiling services and specific and customized solutions.	No	No

Member	Description	Generator Now	Future Generator
Alternate Power International	Alternate Power International (API) provides feasibility study, project design, and project construction management services to the alternate power industry. We can take your project from an idea all the way to an operating power generation system or if you only require certain services such as an environmental study, we can tailor our services to meet your needs.	No	No
AMJ Canada (Ahmadiyya Muslim Community)	Our organization aims to completely support the green initiative and believes that it is achievable through small, community-based projects. Community energy self-sufficiency is one of the aims of our organization.	Yes 2.4 kW	Considering additional solar applications
AMP Solar Group	AMP Solar Group is a photovoltaic integrator that offers commercial and industrial turnkey solutions to our community. We manage the engineers, designers and contractors as well as FIT contract details so that clients feel secure and less stressed about solar array investment.	No	No
BurlingtonGreen	BurlingtonGreen is a non-profit, non-partisan, environmental organization. Through AWARENESS raising, ADVOCACY and ACTION, we aim to mobilize individuals, groups, business and governments to make Burlington a leader in creating a healthy, environmentally responsible city. BurlingtonGreen is creating a renewable energy co-operative to develop community-based green power projects in Burlington.	No	Yes
Camerado Energy Consulting Inc.	Camerado Energy Consulting Inc. provides management consulting, strategic planning, research, negotiation, training, and public consultation services to communities with respect to energy planning, development and conservation. We work with Aboriginal communities, municipalities, community energy cooperatives, and non-governmental organizations to support collaborative community energy planning, effective intervention in environmental assessment and permitting processes, successful negotiation and issues resolution with industry, meaningful consultation with government, and informed and consensus decision-making.	No	No

Member	Description	Generator Now	Future Generator
Canada's Outdoor Farm Show & Canadian Energy Expo (COFS)	As our nation's premier outdoor agricultural showcase, Canada's Outdoor Farm Show offers "one stop shopping" for farmers and highlights the most innovative and technologically advanced agricultural products and services available.	No	No
Canadian German Chamber of Industry and Commerce Inc.	Represents German Business in Canada	No	No
Canadian Solar Industries Association (CanSIA)	CanSIA is the national trade association representing the interests of companies, governments and individuals which share an interest in solar technology. The Association works to strengthen the Canadian solar industry, increase the professionalism of companies, foster domestic and international markets, and promote the use of renewable energies.	No	No
Canadian Solar Solutions Inc.	Canadian Solar Solutions Inc. is a wholly owned subsidiary of Canadian Solar Inc. dedicated to the Canadian solar market. Based in Kitchener, Ontario (Canada), Canadian Solar Solutions is dedicated to providing turnkey solar solutions for residential , commercial and solar farm markets in Canada.	No	No
Canadian Union of Skilled Workers (CUSW)	Since its formation in 1999, CUSW has been challenging the idea of what a union can be. With democratic participation as the driver, CUSW members are changing the way people come together to determine their future.	No	No
CanWEA (Canadian Wind Energy Association)	The Canadian Wind Energy Association (CanWEA) is a non-profit trade association that promotes the appropriate development and application of all aspects of wind energy in Canada, including the creation of a suitable policy environment.	No	No

Member	Description	Generator Now	Future Generator
Centennial Energy Institute	CEI is developing a new focus on the community power sector and OSEA is the organization of choice as a non-profit association focusing on promotion, capacity building and advocacy in the community power sector. OSEA has plans to develop a community power consultancy that combines training of CP experts and with service to help CP groups get projects in the ground and a CEI would be a great partner in developing industry specific programming and gaining recognition as leaders in education in the Renewable Energy Sector.	No	For training purposes
Centre for Applied Renewable Energy	The Centre for Applied Renewable Energy (CARE) was established in 2006 to promote all forms of renewable energy. Located in Huron County in the town of Brussels, the Centre provides information services, general training and project help for those interested in renewable energy, whether it is bio-fuels, hydro, solar or wind.	No	No
City of Greater Sudbury	In 2003, the City of Greater Sudbury released the EarthCare Sudbury Local Action Plan – Becoming a Sustainable Community. The Plan charts a course towards reduced greenhouse gas emissions and improved environmental sustainability for the Greater Sudbury community. Increased energy efficiency and production of renewable energy are among the Plan's key objectives. These objectives continue to be pursued within Greater Sudbury's municipal operations and by the 100+ community, business and institutional partners that have also committed to implementing the EarthCare Sudbury Local Action Plan. The City of Greater Sudbury has also developed an Eco-Industrial Strategy for the future development and operation of industrial lands and businesses within the City.	No	Yes
City of Toronto, Energy Efficiency Office	The EEO investigates innovative technical mechanisms for the purchase of renewable energy, as well as testing or demonstration of new energy generation technologies, such as fuel cells.	No	No
Collingwood Properties Realty CID	Common Interest Development in Collingwood. The most common type of association of homeowners is the nonprofit mutual benefit Corporation.	No	Not at this time

Member	Description	Generator Now	Future Generator
Community Power Fund	The Community Power Fund (CP Fund) was established in 2007 to support project development activities of Ontario-based community organizations pursuing local renewable energy projects, through the provision of a number of financing instruments to support community power, including grants, loans and investment equity.	No	No
Community Renewable Energy Waterloo (CREW)	Community Renewable Energy Waterloo (CREW) is a local non-profit organization dedicated to making renewable energy accessible to the citizens of Waterloo Region. Our vision is to be a network of knowledgeable advocates, early adopters and interested citizens who initiate and support all local projects that encourage energy conservation and sustainable use of energy or materials from naturally regenerating sources such as wind, solar and earth energy.	No	No
Cote Design	Côté Design is committed to assisting small and medium-sized businesses and not-for-profit organizations with their professional communication and promotional material needs. We are dedicated to helping you and your organization create design solutions that facilitate understanding that engages your target audience and ensures memorability.	No	No

Member	Description	Generator Now	Future Generator
Countryside Energy Co-op	Countryside is a group of citizens in a predominantly rural environment, concerned about how we can generate clean energy to help the countryside, towns and their inhabitants. We started off as a local project, the Huron-Perth Community Power Project, which had a key goal in forming a co-operative to develop sustainable energy projects and continuing operational & management processes. The initial name originated in recognition of the Community Future Development Corporations in Huron and Perth counties who sought and obtained seed funding to kick-off the first two projects. The successor Countryside Energy Co-operative Inc is not constrained to the former boundaries and will actively pursue viable renewable energy projects in South-West Ontario. The co-operative was officially inaugurated on August 3, 2005 when the Financial Services Commission of Ontario approved the incorporation. We're a Service Co-operative, which represents an interesting alternative to public service delivery.	No	Site testing and feasibility studies ongoing for two 10 MW wind farms; Partnering with TREC to develop Lakewind.
Detroit Diesel-Allison Canada East	DD-ACE is an authorized diesel engine distributor in Eastern Canada for Detroit Diesel, MTU, Mercedes-Benz, Volvo Penta, Kubota and for Allison Transmission. Our key markets are transportation (trucks and buses), agriculture, construction, fishing, forestry, industrial, mining, oil and gas, power generation.	No	No
Earth Rangers	Earth Rangers works to educate children on how to live more sustainably. Also our base of operations, the Earth Rangers Centre is a sustainable technology demonstration centre. We are interested in working with OSEA to build a renewable hub at the ERC.	For educational purposes and testing	No
Economic Development Corporation of Wawa	Wawa is located 225 kilometres north of Sault Ste. Marie along one of the top-ten drives in Canada, following the breath-taking Lake Superior shoreline. Providing services to several communities in Northeastern Ontario, the Wawa Region covers 90,000 km ² (35,000 square miles) and contains 7,500 people living in: Chapleau, White River, Dubreuilville, and six First Nation communities including Michipicoten First Nation.	No	No

Member	Description	Generator Now	Future Generator
EfstonScience Inc.	EfstonScience supplies Canadians with Alternative Energy Products featuring GUS Vertical Axis Wind Turbines. We offer turnkey installations of Grid-Tie Solar Kits that can be part of the Ontario's Feed-In Tariff Program as well as complete, Off-Grid solar products. To truly embrace alternative power, a lifestyle and attitude change towards power must shift. EfstonScience offers ways to measure how much power is being used to increase awareness and other products that reduces consumption such as very low-wattage LED bulbs. Established in 1970, known for innovative and lead-edge products – expect the same from our Alternative Energy Division.	No	No
Enercon Canada Inc.	ENERCON places great emphasis on delivering top quality products to its customers. In addition, ENERCON feels a strong duty to ensure that its development, manufacturing, and sales processes are safe – safe for people and safe for the environment. These three key values of quality, health and safety, and environmental protection compelled ENERCON Management to formulate 7 guiding principles of company policy:	No	No
EnergyAdvocate.ca	EnergyAdvocate.ca: a consultancy firm focused on providing solutions for the solar industry. Many of the programs and policies are being used successfully by Ontario schools and Boards in particular. “My focus is to educate and thus empower the community. It's not lack of funds that may prevent us from doing the right thing. It's lack of will that would fail us.” “Our strengths are the ability to design the right system for the client, and sometimes more importantly, the ability to find funding for the client. Unique approaches to both facets of what is needed to make it work to produce energy and economy.”	No	No

Member	Description	Generator Now	Future Generator
EthoSolar	EthoSolar is committed to providing farmers/land-owners throughout Ontario the opportunity to both invest in and share the vision for clean, renewable energy by installing solar PV systems on their properties. We are passionate about seeing the individual land-owner able to participate in the new initiatives through the Green Energy Act. We believe that if the average Ontarian can contribute to the generation of sustainable energy, they will be all the more committed to the vision for a future of 100% clean and renewable energy.	No	No
EvolutionGreen.com	EvolutionGreen is a hub of expertise for corporations, governments, and community groups to get connected with experts who can inspire, engage and enable stakeholders in conversations and solutions about sustainability.	No	No
Farmers for Economic Opportunity	Farmers for Economic Opportunity (FEO) is a self-governing, grassroots organization made up of local area farmers who are committed to family farms and rural communities in southwestern Ontario. Their mission is to strengthen Ontario's agricultural economy through rural-based and community driven, renewable energy production. FEO goals include the creation of environmentally friendly, responsibly planned and community supported energy projects on Ontario farmland and adding value to farm gate returns through ownership participation in the processing and manufacturing of biofuels and community-based anaerobic digesters.	No	No
Fort Albany Power Corporation	Fort Albany Power Corporation (FAPC) is owned by Fort Albany First Nation (FAFN) and it is a non-share capital corporation. Fort Albany Power Corporation is the local distributed (LDC) of sole supplier of electricity in the community of Fort Albany, Ontario.	No	No
Generation Seven Consulting	Generation Seven is a boutique consulting firm offering professional planning, communications, and liaison services . We work with First Nations, Government, N.G.O.'s, and the Private Sector to facilitate sustainable development, environmental consulting, and green job creation.	No	No

Member	Description	Generator Now	Future Generator
Golden Dawn Senior Citizen's Home	Golden Dawn Senior Citizen Home is a Long Term Care Facility and Senior Citizen Apartment Complex located in the picturesque village of Lion's Head, Ontario on the shores of Georgian Bay.	No	No
Green Timiskaming Development Co-operative Inc. Grid-Tie Solar	Our objective is to supply 100% of our own energy from renewable sources. Our story begins with our family's initiative to put in a geothermal system, to heat/cool our farm. We then decided to go another step further and put 10kW of solar panels on our barn roof. We are now officially micro generators of renewable electricity for the Province of Ontario! We had such a great experience that we decided to become dealers and installers of solar panels. We have formed a partnership with Home Energy Solutions and Dave Egles. We are excited to be a part of the new move to make Ontario green!	No Yes 10 kW of solar pv	Yes No
Harbourfront Centre	Harbourfront Centre is a vibrant part of the community offering a year-round array of cultural, educational and recreational programs that appeal to people of all ages. Every year, we attract more than 12.6 million visitations, likely making Harbourfront Centre the most widely attended arts and cultural centre in Canada.	No	Possibly
Hearst and Area Economic Development Corporation	Hearst, a small rural community of 6,000 located in Northern Ontario, was born at the time of the construction of the national railway, and for more than a century since, this timber town has relied on its surrounding forests.		Hearst has vision and that to be totally self-sufficient in energy.
Helix Synergy	Helix Synergy Inc. is a Canadian and U.S. commercial wind power development company providing a range of wind power development services from consultancy and project management services to turn-key wind farm siting, construction and financing	No	No
Italian Canadian Savings & Credit Union	Italian Canadian Savings & Credit Union or IC Savings is a credit union that offers a full range of banking services including mortgages, chequing and savings accounts, retirement and investment products.	No	No

Member	Description	Generator Now	Future Generator
Kapuskasing Economic Development Corporation	Kapuskasing Economic Development Corporation (KEDC) is a catalyst for community economic development by coordinating strategic planning exercises and pursuing innovative projects. Kapuskasing is a progressive municipality, working collectively to provide the best quality of life for its bilingual community as well as growth opportunities for its business and industry sectors.	No	No
Leader Energy	Leader Energy.ca Corp. was registered October 19, 2006. The objective was to develop >20 MW's of wind energy projects in southeastern Ontario. A niche area was identified that had significant grid capacity, sufficient agricultural greenbelt, municipal bylaws in place and acceptable wind resource. We are now offering these projects to organizations that have the capacity to build, commission and operate them in a sustainable manner respecting the environment, landowners and the municipality of Clarington	No	Yes
Local Initiative for Future Energy (LIFE) Co-operative	LIFE partners with Community Renewable Energy Waterloo to deliver public education programs, and is otherwise focused on promoting community owned renewable energy assets.	No	LIFE is working on two projects, a co-operatively owned wind farm a biogas installations on local farms.
M.K. Ince & Associates	M.K. Ince and Associates (MKI) is a wind energy consulting firm offering professionally innovative, alternative solutions. Formed in 1993 as an environmental engineering firm, MKI expanded in 2000 to provide wind energy engineering services across Canada. MKI is involved in a number of wind energy projects, ranging from single turbine, community driven projects to commercial scale wind farms.	No	No

Member	Description	Generator Now	Future Generator
Main Street Power Company	Main Street Power is a solar development firm formed as a merger of a non-profit community development agency and a solar company. Every project we undertake has a component of community development and we aim to develop solar projects in low income areas and work with many local governments.	No	No
Mainstream Renewable Power	Our business is the development, construction and operation of wind, solar thermal and ocean current plants. We work to deliver a successful business that accelerates global progress towards a sustainable future. We know that a sustainable future is no longer a choice, it is an obligation.	No	Yes 67 MW in development
Morgan Solar	Morgan Solar's mission is to develop highly efficient, low cost solar technology. Our view is that integrating solar energy into the Ontario grid at a meaningful scale can best be achieved by making it competitive with other electrical generation technologies.	No	No
Neighbourhood Unitarian Universal Congregation	We live in a time of global warming and are witnessing the beginnings of environmental changes which may soon be irreversible. As members of the Neighbourhood Unitarian Universalist Congregation, we have a responsibility to help resolve these problems, as we are able. Half of the \$220,000 cost of the installation will be covered by an interest-free loan from the City of Toronto. The other half will be raised from donations and by issuing debentures to friends and supporters. We are issuing 110 debentures for \$1000 each at 5% interest paid annually. They can be held for up to 20 years, but NUUC reserves the right to redeem them at any time prior to maturity; holders may also choose to donate the principal at some point in return for an income tax receipt.	No	Yes Installing 20.91 kW (PV) system
New Media Architects	NMA (New Media Architects Ltd.) is a Toronto-based independent software developer (ISV) of extranets, intranets and content managed websites that give information-based organizations a highly-effective web-based communication channel	No	No

Member	Description	Generator Now	Future Generator
Ontario Co-operative Association	The Ontario Co-operative Association provides innovative programs and services to support its members, and strengthen and enhance the Ontario co-operative sector. These programs and services are organized according to On Co-op's four strategic areas: Lifelong Co-operative Learning; Government Relations, Communications and Member Relations and Co-operative Development	No	No
Ontario Solar Network	Ontario Solar Network, founded in March 2010, is an association comprised of individual solar energy producers, solar businesses and other stakeholders committed to the highest standards of professionalism. Ontario Solar Network mission is to advance business development for all stakeholders in the Ontario's solar industry through providing market intelligence, educational programs and networking events.	No	No
Orangeville & Dufferin County Wind Co-op	Emerging Community Power Group	No	Yes
PACE	PACE is a stakeholder relations firm that works with provincial government agencies to refine and promote sustainable policies. We have significant expertise in the energy policy field and also work with developers to create successful renewable energy projects. The vast majority of our project and policy work in the Ontario energy sector falls under the scope and intent of the GEA.	No	No
Pioneer Solar	Pioneer Solar is a leading full-service solar provider for homeowners, businesses, educational institutions, government organizations, and community cooperatives — the first company in Canada to provide solar power system design, financing, installation, and energy auditing services. Pioneer Solar takes cares of all permits and applications necessary to secure a microFIT or FIT contract.	No	No

Member	Description	Generator Now	Future Generator
Preneal Canada	PRENEAL develops, builds and operates wind farms on a long-term basis with community, municipal, regional and private partners. Our co-ownership, community-based approach to wind farming is new to North America. To maximize local economic benefits, we offer the community, landowners, wind-farm neighbours and private investors the possibility of owning a substantial amount of equity in the wind farms.	No	Only in Maritimes at present
Prince Edward County	A beautiful island adventure, Prince Edward County is a mecca for artists, nature lovers and anyone looking for a getaway ... for a weekend break or for life. Renowned for its sailing, fishing and giant sand dunes, The County also offers live theatre, artists studios and galleries, unique regional cuisine and a flourishing wine region.	No	No
REpower Systems Inc.	Repower Systems Inc. has been incorporated in Canada since December 2007. It is a wholly owned subsidiary of Repower Ag with offices in North Bay, Toronto, Montreal and Gaspé. Our driver is to be the leading technical force in the wind industry	No	No
Sarnia-Lambton Economic Partnership	Sarnia-Lambton's past and present create a solid foundation for its future. New Cleantech and Industrial Bioproducts sectors are no longer futuristic concepts - our community has worked to meld these new sectors with our tradition industries to create a well-rounded economic base and vast potential for the future.	No	No
Saturn Power	As a total solar solution supplier Saturn Power will look after every phase of your project from initial consultation to project commissioning: this includes submitting your micro-FIT application, developing a forecast of the electrical production and financial projection, helping to arrange financing if necessary, project management and installation and finally project commissioning.	No	No

Member	Description	Generator Now	Future Generator
Schneider Power	The Company has a successful track record of renewable energy development in Canada, having completed the construction of the Providence Bay Wind Farm, Manitoulin Island, Ontario in 2007.	The Providence Bay Wind Farm is an operating 1.6 MW on Manitoulin Island Ontario.	Yes new generation of projects: Arthur, Trout Creek, Innisfil and Spring Bay.
SKON Technologies	SKON Technologies is a developer of small and medium scale wind energy projects. Founded in 2004 and based in Markham, Ontario, SKON intends to help advance clean, efficient and renewable energy in Canada and provide greater economic opportunities to rural areas. Our role is to invest in new projects at the earliest stage and advance them through each phase of the development cycle until the wind farm is constructed and operational.	No	Yes
SkyPower Limited	SkyPower is Canada's leading developer of solar energy projects with an extensive pipeline of projects that represents hundreds of megawatts of potential nameplate capacity across North America. SkyPower prospects, develops, manages, finances, and owns solar energy projects from initial discovery stages through to commercial operation.	Yes 18.5 MW	Yes
Sun Run	Sun Run Inc. is an alternate energy developer working with individuals to develop more electricity from solar.	No	No
Sustainable Ottawa Community Energy Co-operative*	Sustainable Ottawa Community Energy Co-Op is a community based non-profit organization. Our mission is to make sustainable technologies, products and services more accessible and economically viable to people within the NCR. We do so through increasing public awareness of sustainable energy technologies (i.e. solar and wind), and by using the collective bargaining power of the Co-Op to reduce the cost of sustainable energy technologies for members of the Co-Op and the public.	No	No
Switch Kingston	SWITCH is dedicated to improving the environmental and economic sustainability of the Kingston region through promoting development and commercialization of energy efficient and alternative energy technologies, products, processes, and services.	No	No

Member	Description	Generator Now	Future Generator
Toronto Atmospheric Fund (TAF)	TAF's endowment supports local emissions reduction projects - at no expense to the taxpayer. Meanwhile, projects financed by TAF loans have saved the City \$17.5 million — over \$2.7 million annually — in cumulative energy and maintenance costs.	No	No
Toronto Renewable Energy Co-operative (TREC)	The Toronto Renewable Energy Co-operative is a non-profit, co-operative, environmental organization formed in 1998. At TREC, we are working hard to create a world in which everyone is fully aware of the link between their energy habits and environmental impacts and all people have a clear and easy choice for participating in renewable energy and conservation activities. We believed this can be accomplished by building community-based and owned renewable energy projects and educating Ontarians and visitors about renewable energy, energy efficiency and conservation and the community power model.	Yes 660 kW, wind turbine located at Exhibition Place. More than 400 Ontarians are investors and shared owners in the Windshare turbine.	TREC is also a partner in the development of the 10 MW Lakewind Power project and is developing a model for a co-operatively-owned solar model called SolarShare.
Upper Lakes Environmental Research Network (ULERN)	Engage in Partnerships to address environmental and natural resource impacts on human health.	No	No
Wikwemikong Unceded Indian Reserve	The Community of Wikwemikong has 7155 members. The Indian Reserve is situated on the eastern side of Manitoulin Island. Projects: Wikwemikong is currently developing a locally-owned wind power project on Manitoulin Island	No	Yes
Willms & Shier Environmental Lawyers LLP	Willms & Shier Environmental Lawyers LLP is an environmental, aboriginal and energy law firm. We represent First Nations and proponents seeking to start renewable energy projects and advise and guide them through the legal and regulatory requirements.	No	No

Member	Description	Generator Now	Future Generator
Wind Simplicity Inc.	Wind Simplicity is the designer and manufacturer of the high-efficiency, compact, noise free Windancer™ that helps save the environment by turning pollution-free wind energy into electricity. A revolutionary horizontal-axis wind turbine, the Windancer™ is available in 3, 7 and 23 kW. The Windancer is ideal for anywhere electricity is required where there are good wind resources, including your home, cottage, condo, school, farm or business.	No	No
Windfall Ecology Centre	Windfall Ecology Centre is an environmental non profit organization and social enterprise specializing in individual and community education and activation. Through our programs and advocacy efforts, we seek to empower individuals, community groups and governments to build sustainable communities. We design and deliver on-the-ground education, awareness and direct climate change mitigation programs. Major areas of endeavour include energy conservation, renewable energy production, water protection education and leadership development.	No	No
Windy Hills Caledon Renewable Energy	The objectives of Windy Hills Caledon are to: raise community spirit and involvement around a community owned wind-based renewable energy project, undertake studies to assess viability of the same, fundraise for professional support as appropriate for the same and raising environmental awareness in the Caledon community.	No	Yes 10 MW, 5 turbine wind project

ONTARIO ENERGY BOARD

IN THE MATTER OF sections 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 requirements and the fees which it proposes to charge for the year 2011;

NOTICE OF MOTION

**WILLMS & SHIER
ENVIRONMENTAL LAWYERS LLP**
4 King Street West, Suite 900
Toronto, Ontario M5H 1B6

Cherie Brant
LSUC # 48242S

Tel: 416-862-4829
Fax: 416-863-1938

Counsel for the Moving Party, OSEA