OGILVY RENAULT

Direct Dial: (416) 216-2311 Direct Fax: (416) 216-3930 rking@ogilvyrenault.com

FILED ON RESS SENT BY COURIER

Toronto, January 25, 2011

Kirsten Walli Board Secretary Ontario Energy Board Suite 2700 2300 Yonge Street Toronto, ON M4P 1E4

Dear Ms. Walli:

RE: Ontario Power Authority (EB-2010-0279) 2011 Revenue Requirement Submission Interrogatories of Association of Power Producers of Ontario

Please find attached the information requests of the Association of Power Producers of Ontario to the Ontario Power Authority in the above-noted proceeding.

Yours very truly,

CY: Richard King

RK/mnm

Att.

cc. All Parties to EB-2010-0279

ASSOCIATION OF POWER PRODUCERS OF ONTARIO

INTERROGATORIES TO ONTARIO POWER AUTHORITY ("OPA")

- 1. Please provide a copy of any study or analysis (internal or third party) carried out to consider the impacts (on the Ontario electricity market) of extending the OPA fee to exporters.
- 2. Did the OPA consult with any stakeholders in the electricity sector regarding the potential impacts of extending the OPA fee to exporters? If so, please identify those stakeholders consulted and provide a brief description of any consultation undertaken.
- 3. Please provide a copy of the OPA's response to AMPCO Information Request 51 in the IPSP proceeding (EB-2007-0707, filed June 18, 2008 at Exhibit I, Tab 5, Schedule 51).
- 4. At line 10 of page 3 in Exhibit D, Tab 1, Schedule 1, the OPA states that: "The overall requested fee of \$0.523/MWh for 2011 decreases by 5% over the \$0.551 rate charged in 2010..." If the OPA had not proposed to extend the usage fee to exporters (i.e., if the fee were to continue to apply just to Ontario consumers), what would the proposed 2011 usage fee be, and what would be the percent change relative to the current usage fee?
- 5. At line 14 of page 2 in Exhibit D, Tab 1, Schedule 1, the OPA states that: "... export customers also benefit from the planning, conservation and procurement activities undertaken by the OPA."
 - (a) How are the interests of exporters taken into account in the OPA's planning activities?
 - (b) How are the interests of exporters taken into account in the OPA's activities related to conservation?
 - (c) How are the interests of exporters taken into account in the OPA's activities related to procurement?

To the extent that the OPA does provide planning, conservation and/or procurement activities for the benefit of exporters, please provide: (a) the legislative or other authority for undertaking such activities; and (b) a copy of any documentation referencing any such activities performed by the OPA.

6. Exhibit A, Tab 5, Schedule 1 lists the Minister's Directives to the OPA (as well as "Other Letters to OPA from Minister - Not Considered Directives") and provides an explanation of each Directive or other letter. Please indicate which of these are for the benefit of exporters of power.

7. At line 2 of page 3 in Exhibit D, Tab 1, Schedule 1, the OPA states that recovery of its usage fee is "consistent with the practice used by the IESO for recovery of its fees." Please provide: (a) a copy of the statutory objects of both the IESO and the OPA; (b) a copy of the OPA licence and IESO licence issued by the Ontario Energy Board; and (c) a copy of the "purposes" section of the IESO Market Rules (i.e., section 4.2 of Chapter 1).