

ONTARIO ENERGY BOARD

IN THE MATTER OF sections 18 and 19 of the *Electricity Act, 1998*;

AND IN THE MATTER OF a Submission by the Independent Electricity System Operator of 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 2008

NOTICE OF INTERVENTION

OF THE ASSOCIATION OF POWER PRODUCERS OF ONTARIO ("APPrO")

December 21, 2007

MACLEOD DIXON LLP

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Counsel to APPrO

Statement of Interest

1. APPrO is an organization representing over 95 percent of the Ontario electricity market, with members who have more than 30,000 MW of power generation capacity. APPrO's membership includes generators, marketers, contractors, equipment suppliers, consultants, LDCs, fuel suppliers, service providers, financiers and individuals and its mission is to promote the interests of its members within an open and competitive power industry in Ontario. APPrO has previously intervened in many public hearings and policy development consultations. A number of generation facilities in Ontario currently rely on gas-fired generation. Any matter impacting on the gas sector will consequently impact on those facilities and on the electricity sector in general.
2. APPrO, through its members, has a direct interest in the Board's review of the Independent Electricity System Operator ("IESO") 2008 proposed revenue requirements, expenditures and fees which the IESO proposes to charge for the year 2008 (the "Application"), as there may be significant interest and impact to all electricity generators in Ontario. APPrO therefore requests the right to intervene in these proceedings.

Intervention

3. In compliance with the Board's Notice of Application and Hearing dated December 12, 2007, APPrO hereby gives notice of its intention to intervene and participate fully in the Independent Electricity System Operator ("IESO") 2008 proposed revenue requirements, expenditures and fees for review by the Ontario Energy Board.
4. APPrO reserves the right to be heard, to appear by or with counsel, to cross-examine on all matters raised during any hearing that may relate to its interests, to adduce evidence on specific matters of its choice related to the application, and to present argument.
5. APPrO hereby requests that the Board, the IESO and all other intervenors provide it and its counsel with copies of all evidence and correspondence related to the application and any hearing relating to the application.
6. APPrO is claiming eligibility to receive an award of costs in this proceeding on the basis that it represents a public interest relevant to the Board's mandate and several of the

issues to be decided in this proceeding may involve the implementation of prior Board decisions on proceedings where APPrO was active and awarded costs for their valuable contribution (such as EB-2007-0040).

7. The mandate of the Board in respect of electricity includes the objectives of promoting economic efficiency and cost effectiveness and facilitating the maintenance of a financially viable electricity industry. APPrO submits that it has consistently represented a unique industry view to support this objective and therefore APPrO submits that it should be assisted in its participation through an award of costs.
8. APPrO submits that it is eligible to receive costs because its members represent a distinct stakeholder group with a direct interest in the cost of service and marketplace implications of IESO expenditures and revenues. APPrO's participation in this proceeding will facilitate the review of such expenditures and revenues and their impact on economic efficiency, cost effectiveness, the maintenance of a financially viable electricity industry, and the full implementation of prior Board decisions.

Communications

9. All communications relating to this Application, this Notice of Intervention, and the Hearing should be directed to:

APPrO

25 Adelaide Street East
Suite 1602
Toronto, Ontario M5C 3A1

Attention: Mr. David Butters, President

Tele: (416) 322-6549
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Email: david.butters@appro.org

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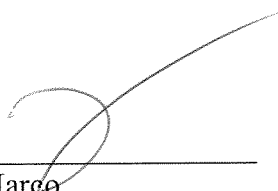
MACLEOD DIXON LLP

Toronto-Dominion Centre
Canadian Pacific Tower
100 Wellington Street West
Suite 500, P.O. Box 128

DATED at Toronto, Ontario this 21th day of December 2007.

THE ASSOCIATION OF POWER PRODUCERS OF ONTARIO ("APPrO")

By its counsel, Macleod Dixon LLP



Elisabeth (Lisa) DeMarco

TO:

ONTARIO ENERGY BOARD

2300 Yonge Street, 27th Floor
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Attention: Ms. Kirsten Walli, Board Secretary

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Email: Boardsec@oeb.gov.on.ca

- and -

INDEPENDENT ELECTRICITY SYSTEM OPERATOR

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