

21 December 2007

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board

by E-mail

Dear Ms Walli:

Re: EB-2007-0791- OPA request for written hearing

We are in receipt of Mr. Cass' letter of December 21 responding to our earlier communication on this topic.

Mr. Cass suggests that the example we have provided, OPA's proposed pilot on Environmental Attribute Trading, is not a significant issue deserving of oral hearing. Let me offer some perspective.

From publicly disclosed information we understand that OPA holds more than 1.2 million REC's where one REC is representative of the environmental attributes from one MWhr of cleaner generation.

In contrast, the web site of the largest entity currently marketing green power attributes in Ontario, Bullfrog Power, shows that its largest customer, Walmart, currently buys 20,000 RECs per year and its next five largest customers combined add up to a similar amount.

Thus if OPA offers just 1% of its holdings to 'test the market' in its "spectrum of pilots" and its "plans to expand these initiatives throughout 2008" (Ex.B, Tab 4, page 5 at lines 8-14) it will be operating at the same order of magnitude.

Of course, even the possibility that OPA will do so may chill the market for such attributes, potentially jeopardizing the very survival of organizations such as Bullfrog.

I attach a copy of Bullfrog's submission with respect to the IPSP issues which explains the issue more fully.

Sincerely,



David Poch

Cc: F. Cass, Pollution Probe