

**APPRO INTERROGATORY 1**

**QUESTION**

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.

**RESPONSE**

The OPA has not conducted or commissioned a study of the impacts on the electricity market of extending the OPA fee to exporters.



**APPRO INTERROGATORY 2**

**QUESTION**

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.

**RESPONSE**

The OPA did not conduct stakeholder consultations specific to its proposal to extend its fee to exporters. The OPA looks forward to engaging in further dialogue with intervenors regarding the OPA's proposal.



**APPRO INTERROGATORY 3**

**QUESTION**

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).

**RESPONSE**

Please see Attachment 1 to this exhibit.



**APPRO INTERROGATORY 4**

**QUESTION**

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?

**RESPONSE**

Please see the response to Board Staff Interrogatory 30, at Exhibit I-1-30.





**APPRO INTERROGATORY 5**

**QUESTION**

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 OP A."

(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.

**RESPONSE**

a) The OPA's initiatives under Strategic Objective 1 are described at Exhibit B-1-1, and have been established to support the formulation of a long term system plan that integrates conservation; evaluates a range of possible supply options and requirements; and considers and proposes transmission options and priorities. Other initiatives, such as supporting the development and implementation of local area plans and the implementation of the FIT program ensure that the system is able to incorporate load growth and renewable generation in a reliable and sustainable manner.

These activities are undertaken for the benefit of all users of the electricity system, which includes both domestic and export customers. Exporters are directly impacted by OPA planning activities that result in the development and maintenance of an Ontario electricity system that can reliably incorporate export volumes.

b) The OPA's activities in this regard are described at Exhibit B-2-1. The OPA's activities related to the planning, procuring and support of the development of verified conservation/energy efficiency resources and enabling partners to achieve conservation targets create sufficient capacity on the system to accommodate the needs of both domestic and export customers. Further, to the extent that costly system expansions are avoided or delayed through the resulting peak and energy efficiency savings,

- 1 transmission costs are minimized, reducing the overall cost/MW to be paid by domestic  
2 and export customers.
- 3 c) The OPA's activities in this regard are described at Exhibit B-3-1. The OPA enters into  
4 procurement contracts for electricity supply that are available, and provide direct  
5 benefits, to both domestic and export customers.
- 6 The fees which the OPA has proposed to recover through exports are less than those  
7 recovered by the IESO and are minimal when considered on a volumetric basis.

**APPRO INTERROGATORY 6**

**QUESTION**

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.

**RESPONSE**

Please see the response to APPrO Interrogatory 5, at Exhibit I-8-5. All of the planning, conservation and supply procurement activities of the OPA provide benefits to both domestic and export customers. Directives from the Minister to the OPA relating to these activities would therefore provide benefits to export, as well as domestic, customers. Of the 54 directives and letters listed, all are related to planning, conservation or supply activities.



1 **APPRO INTERROGATORY 7**

2 **QUESTION**

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

9 **RESPONSE**

10 Copied from the *Electricity Act*, 1998 are the statutory objects of both the IESO and the  
11 OPA as follows:

12 ***Objects and character***

13 5. (1) *The objects of the IESO are,*

14 (a) *to exercise the powers and perform the duties assigned to the IESO under this Act, the*  
15 *market rules and its licence;*

16 (b) *to enter into agreements with transmitters giving the IESO authority to direct the*  
17 *operation of their transmission systems;*

18 (c) *to direct the operation and maintain the reliability of the IESO-controlled grid to promote*  
19 *the purposes of this Act;*

20 (d) *to participate in the development by any standards authority of standards and criteria*  
21 *relating to the reliability of transmission systems;*

22 (e) *to work with the responsible authorities outside Ontario to co-ordinate the IESO's*  
23 *activities with their activities;*

24 (f) *to collect and provide to the OPA and the public information relating to the current and*  
25 *short-term electricity needs of Ontario and the adequacy and reliability of the integrated*  
26 *power system to meet those needs; and*

27 (g) *to operate the IESO-administered markets to promote the purposes of this Act. 2004,*  
28 *c. 23, Sched. A, s. 5 (1).*

**Objects and character**

25.2 (1) *The objects of the OPA are,*

(a) *to forecast electricity demand and the adequacy and reliability of electricity resources for Ontario for the medium and long term;*

(b) *to conduct independent planning for electricity generation, demand management, conservation and transmission and develop integrated power system plans for Ontario;*

(c) *to engage in activities in support of the goal of ensuring adequate, reliable and secure electricity supply and resources in Ontario;*

(d) *to engage in activities to facilitate the diversification of sources of electricity supply by promoting the use of cleaner energy sources and technologies, including alternative energy sources and renewable energy sources;*

(e) *to establish system-wide goals for the amount of electricity to be produced from alternative energy sources and renewable energy sources;*

(f) *to engage in activities that facilitate load management;*

(g) *to engage in activities that promote electricity conservation and the efficient use of electricity;*

(h) *to assist the Ontario Energy Board by facilitating stability in rates for certain types of consumers;*

(i) *to collect and provide to the public and the Ontario Energy Board information relating to medium and long term electricity needs of Ontario and the adequacy and reliability of the integrated power system to meet those needs. 2004, c. 23, Sched. A, s. 29.*

Filed as Attachments 1 and 2 to this exhibit respectively are copies of the IESO and OPA licences.

Chapter 1 Introduction and Interpretation of The Market Rules, Section 4.2 Purposes of Market Rules is filed as Attachment 3 to this exhibit.