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APPRO

ASSOCIATION OF
POWER PRODUCERS
OF ONTARIO

March 10, 2011

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, ON M4P 1E4

Dear Ms. Walli,

**Re: Preliminary Assessment Incentive Regulation Plan of Natural Gas Utilities
- Board File No. EB-2011-0052**

The Association of Power Producers of Ontario (APPRO) wishes to participate in the above noted consultation.

APPRO also requests that it be eligible for consultation costs incurred in its participation, as outlined in the Board's letter and Appendix of February 25th, 2011.

APPRO is a non-profit association that advocates on behalf of Ontario generators in a number of settings, including regulatory proceedings before the Board. APPRO members represent more than 98% of Ontario's generating capacity and are active in every generation technology: gas, wind, cogeneration, district heat and power, nuclear, hydroelectric, coal, solar, geothermal, energy from waste and fuel cells.

Gas-fired generators are an increasing component of the Ontario electricity system, significant users of natural gas (current estimates are that ~90-120 Bcf/year post 2010 will be consumed in Ontario by gas-fired generators once the gas generation build-out is complete), and major customers of Ontario's regulated gas utilities. Almost all of Ontario's current or contemplated natural gas fired generation capacity is owned and/or operated by APPRO member companies. They are directly affected by the availability of gas services and the rates that are charged by Union and Enbridge. APPRO believes that as the association representing these generators, its participation will prove valuable both to Board Staff, and the Board in discharging its public interest obligations.

It is for similar reasons that APPRO has actively participated in the past in the Natural Gas Electricity Interface Review (EB-2006-0338), the Incentive Regulation Framework

for Natural Gas Utilities (EB-2006-0209), and the Gas Natural Gas Storage Allocation Policies process (EB-2007-0724/EB-2007-0725), and the Storage and Transportation Access Rule (EB 2008-0052), and the 2010 Natural Gas Market Review (EB-2010-0199), among others. I am confident that APPrO's participation in those proceedings has been of assistance to the Board.

It would be appreciated if all notices with respect to the proceeding, and copies of all submissions, be delivered to the writer:

David Butters
President & CEO
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25 Adelaide St. East, Suite 1602
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Fax: 416 481-5785
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In addition, copies of all materials should be sent to:

Mr. John Wolnik
c/o Elenchus Research Associates Inc.
34 King St. East, 6th Floor
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Tel/Fax: 519-474-0844
Cell: 519-873-0685
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and

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Respectfully,

A handwritten signature in black ink, appearing to be 'David Butters', enclosed within a large, loopy oval shape.

David Butters
President & CEO