

14 April 2011

Ms Martha McQuat  
Ontario Power Authority

By electronic filing and e-mail

Dear Ms McQuat:

**Re: EB-2010-0279 OPA Revenue – GEC areas of interest for oral hearing**

Further to the Board's direction and your letter of April 13<sup>th</sup>, I can offer advice on the GEC's areas of concern. Please note that in some cases GEC is not in a position to know which witnesses will be best equipped to address each matter. For example, we are concerned about the availability of studies on conservation potential and codes and standards and OPA's plans to 'exceed or accelerate achievement' of the CDM goals in the LTEP. Part of that matter is referenced at B-1-1, p. 2, l. 22 under Strategic Objective #1 but we anticipate that the witness panel addressing Strategic Objective # 2 might be the logical panel to answer questions about the scope and timing and availability of such studies. We would appreciate any advice you can offer.

GEC has identified the following topics:

- Timing of the IPSP process and the implications for the CDM change process.
- Adequacy, transparency and accountability of CDM planning and evaluation (including past and anticipated progress on the milestone: "Proactively and consistently delivered high-quality stakeholder outreach and engagement activities.").
- Appropriateness of proposed CDM and related communications milestones.
- Consistency of OPA CDM goals and efforts (including codes and standards work and assumptions) with government policy goals. (Note: GEC does not intend to address measure or program level detail in regard to the CDM matters except by way of example.)
- Impact of the OPA efficiency incentive and of the payment structure (in the master agreement) on the LDCs' motivation to achieve and overachieve on CDM.

- Regulatory mechanism going forward, including funding and accountability for changes to the CDM portfolio and programs (both LDC-delivered and OPA-delivered).
- OPA's role and responsibilities and anticipated timing to address connection problems in regard to the implementation of the FIT and MicroFIT.
- Uncertainties resulting from the Japanese nuclear crisis (e.g. on the timing of nuclear procurements) and the cascading implications of any such delay for the OPA work plan, budget and the regulatory process.
- Budget and regulatory mechanisms to address shortcomings in any of the above.

We trust this information will be of some assistance to the OPA. Please feel free to contact us if clarification is needed.

Sincerely,

A handwritten signature in black ink, appearing to read 'David Poch', with a stylized flourish at the end.

David Poch

Cc: Board Secretary  
All Parties