

June 26, 2012

Filed on RESS and Sent by Courier

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto, ON M4P 1E4

Your reference
EB-2012-0031

Our reference

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Dear Ms. Walli:

Hydro One Networks Inc. – Transmission Rates (EB-2012-0031)

The Association of Power Producers of Ontario (“APPrO”) respectfully requests intervenor status in the above-noted proceeding.

Please do not hesitate to contact me should you have any questions or concerns.

Yours very truly,

“Signed by”

John Beauchamp

JB/mnm

cc: D.H. Rogers (Counsel for Hydro One Networks Inc.)
P. Catalano (Hydro One Networks Inc.)
D. Butters (APPrO)
J. Wolnik (Elenchus)

DOCSTOR: 2457023\1

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c.15 (Sched. B);

AND IN THE MATTER OF an Application by Hydro One Networks Inc. for an Order or Orders approving just and reasonable rates and other service charges for the transmission of electricity, effective on January 1, 2013 and January 1, 2014.

**NOTICE OF INTERVENTION OF
ASSOCIATION OF POWER PRODUCERS OF ONTARIO (“APPrO”)**

June 26, 2012

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1. APPrO is a non-profit organization representing more than 100 companies involved in the generation of electricity in Ontario, including generators and suppliers of services, equipment and consulting services. Our members produce nearly all the power generated in Ontario from facilities of many types including gas-fired, hydro-electric, nuclear and wind energy.
2. Hydro One Networks Inc. ("HONI") has filed an application with the Ontario Energy Board (the "Board") on May 28, 2012 under section 78 of the *Ontario Energy Board Act, 1998*, S.O. 1998, c.15 (Schedule B). HONI is seeking approval for changes to its 2013 and 2014 transmission revenue requirement and for approval for changes to the provincial uniform transmission rates charged for electricity transmission to be effective January 1, 2013 and January 1, 2014
3. APPrO hereby requests intervenor status in the above-noted proceeding. APPrO expects to limit its intervention to issues of material impact on generators, most notably the Export Transmission Service ("ETS") tariff.
4. As directed by the Board, the IESO is currently undertaking an ETS study, the results of which will be included as part of HONI's application. It is our understanding that the Board will adjudicate the appropriate ETS rate as part of this proceeding (i.e. the Board's decision will set the ETS tariff). Any change to the ETS tariff will have a considerable effect on import and export volumes in Ontario, the results of which have serious implications for our members. APPrO's members thus have a direct and significant interest in this proceeding.
5. APPrO also believes it is in the public's interest to facilitate generator participation. Firstly, the great majority of APPrO members are customers of HONI, as defined in the Transmission System Code. Secondly, APPrO's members build and plan new projects in response to OPA procurement programs (and consequent contracts) and Ministerial Directives that incorporate provincial policy objectives. Much of the transmission development that is planned or underway at HONI is related to accommodating generation. Accordingly, the Board should facilitate the participation of generators in order to provide the best evidentiary basis for its determination. In addition, many of APPrO's members are too small to participate individually in a meaningful way in this proceeding. APPrO's participation facilitates the involvement of such members, and ensures that the Board has before it a comprehensive representation in this proceeding from the power generator
6. Pursuant to s. 3.06 of the Board's Practice Direction on Cost Awards, APPrO intends to seek an award of costs from HONI as a customer of the Applicant. In accordance with s. 3.03(a) of the Board's Practice Direction on Cost Awards, APPrO represents the direct interests of consumers in relation to HONI's regulated services. APPrO has participated in many hearings and consultations before the Ontario Energy Board involving electricity-related transmission matters.

APPrO also has a record of participating in Board proceedings in a responsible and efficient manner. The Board has previously found APPrO to be eligible for cost awards in other proceedings including, among others: HONI's application for its 2011/2012 revenue requirement and rates; the Transmission Connection Cost Responsibility Review; and several natural gas proceedings that had unique impacts on power generators (i.e., NGEIR, storage allocation, etc.) APPrO believes it is appropriate for the Board to do so again in the context of this proceeding.

7. APPrO reserves the right to participate in all aspects of the proceeding and hereby requests that the Board, HONI and any other intervenors provide it and its counsel with copies of all evidence and correspondence related to the proceeding, at the contact information below:

APPrO
25 Adelaide St. East
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Attention: David Butters, President
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AND

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AND

Elenchus Research Associates Inc.
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Toronto, ON, M5C 2X8

Attention: John Wolnik
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Facsimile: 416) 348-9930
E-mail: jwolnik@elenchus.ca

ALL OF WHICH IS RESPECTFULLY
SUBMITTED THIS
26th day of June, 2012

“Signed by”

John Beauchamp
Norton Rose Canada LLP
Counsel for APPrO