January 29, 2013

Ms. Kirsten Walli Ontario Energy Board P.O. Box 2319, 27th Floor 2300 Yonge Street Toronto, ON M4P 1E4



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On January 1, 2012, Macleod Dixon joined Norton Rose OR to create Norton Rose Canada.

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Our reference 01006736-0122 Email Alan.Mark@nortonrose.com

Dear Ms. Walli:

In the Matter of the Electricity Act, 1998, s. 33;

And in the Matter of the Ontario Energy Board Act, 1998, s. 21;

And in the Matter of an application by Acconia Wind Energy Canada Inc., Brookfield Power Wind Prince LP, CP Renewable Energy (Kingsbridge) Limited Partnership, Erie Shores Wind Farm Limited Partnership, Greenwich Windfarm LP, Talbot Windfarm, LP, Enbridge Renewable Energy Infrastructure Limited Partnership, Kruger Energy Port Alma LP, Suncor Energy Products Inc., Canadian Renewable Energy Corp., and Canadian Hydro Developers, Inc. (collectively, the "RES Generators") for an order that the Independent Electricity System Operator ("IESO") prepare evidence that is relevant to a pending appeal of a Market Rule Amendment dated November 29, 2012

Board File No.: EB-2013-0010

We write further to the Board's Procedural Order No. 1 issued on January 22, 2013 ("PO1").

Enclosed are the Independent Electricity System Operator ("IESO") productions responsive to PO1. The enclosed production does not include documents that pertain only to centralized forecasting or any other Market Rule amendments that were part of SE-91 but which are not the subject of the review application. The enclosed production relates to the R02-R06 amendments. All materials pertaining to centralized forecasting and associated Market Rule Amendments are publicly available on the SE-91 website, namely, <u>http://www.ieso.ca/imoweb/consult/consult/se91.asp</u>. The enclosed production includes the following:

- 1. all Market Rule Amendment Submissions relating to the Renewable Integration Amendments, including any covering memoranda bates numbers IESO0000001 to IESO0000039;
- all written submissions received by the IESO in relation to the Renewable Integration Amendments bates numbers IESO0000040 to IESO0000266;
- minutes or meeting notes of all stakeholder meetings (including meetings of the IESO's Stakeholder Advisory Committee and any stakeholder meetings conducted under the auspices of the SE-91 initiative) and all IESO Technical Panel meetings at which the Renewable Integration Amendments or the subject

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matter of the Renewable Integration Amendments were discussed – bates numbers IESO0000267 to IESO0000704;

- a list and copy of all materials related to the Renewable Integration Amendments or the subject matter of the Renewable Integration Amendments tabled before any stakeholders (including the IESO's Stakeholder Advisory Committee and in respect of any consultations conducted under the auspices of the SE-91 initiative) or before the IESO's Technical Panel – bates numbers IESO0000705 to IESO0002305;
 - the production responsive to this item includes SE-57 materials commencing February 10, 2009, the point at which the scope of SE-57 was expanded to include surplus baseload generation; and
 - the SE-91 materials includes all Dispatch Technical Working Group ("DTWG") and Floor Price Focus Group ("FPFG") materials and does not include Visibility Technical Working Group ("VTWG") materials as these materials are not relevant to the R02-R06 amendments; and
- a list of all materials tabled before the Board of Directors of the IESO in relation to the Renewable Integration Amendments or the subject matter of the Renewable Integration Amendments, and a copy of all such materials other than those already captured by item (1) above – bates numbers IESO0002306 to IESO0002630;
- 6. a copy of the decision of the Board of Directors of the IESO adopting the Renewable Integration Amendments - bates numbers IESO0002631 to IESO0002663;
- the analysis conducted by the IESO relating to the environmental benefits, cost savings and system operational efficiencies that could be gained through the Renewable Integration Amendments, to the extent not already captured by any of the items above – bates numbers IESO0002664 to IESO0003441; and
- 8. information relating to the consistency of the Renewable Integration Amendments with the purposes of the Electricity Act, including all materials relating to the development and consideration of options that involved alternatives to imposing the Renewable Integration Amendments' dispatch and floor price requirements on variable generators, to the extent not already captured by any of the items above – bates numbers IESO0003454 to IESO0003930.

Two (2) copies of a disk containing the above-noted productions have been sent by courier to your attention.

Yours very truly, Alan Mark AM/dm Jennifer Teskey, Norton Rose Canada LLP Copy to: George Vegh, counsel to RES Generators (with enclosure)