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Monday February 4, 2013

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street, 227th Floor
Toronto, Ontario, M4P 1E4

**RE: Ontario Energy Board File Number EB-2013-0004
Development of a Standby Rates Policy for Load Displacement Generation
Nomination Letter - Ontario Association of Physical Plant Administrators**

Dear Ms. Walli:

This request is in response to the Board's letter of January 24, 2013 initiating a consultation process for the development of standby rates for Load Displacement Generation (LDG) and the formation of the Load Displacement Generation Working Group (LDGWG).

The Ontario Association of Physical Plant Administrators (OAPPA) is interested in participating in the working group for the reasons outlined below. OAPPA has retained Aegent Energy Advisors Inc. to assist on matters related to this consultation, and OAPPA is nominating one of Aegent's consultants for participation in the LDGWG on behalf of OAPPA. OAPPA is also requesting that it be found eligible for a cost award.

Reasons for Interest in Consultation

OAPPA is a an organization whose membership includes the physical plant administrators for provincially-assisted universities in Ontario. The 22 universities making up OAPPA span the province from Thunder Bay to Ottawa to Windsor. OAPPA represents members from 15 local distribution companies (LDC) and includes members with a broad range of LDG projects. While some members have no LDG at all, others have Non-Utility Generators under contract with the Ontario Electricity Financial Corporation, uncontracted merchant LDG, and LDG participating in demand response programs. This broad range of LDCs and LDG contracts and configurations uniquely positions OAPPA to provide a balanced perspective on behalf of a broad cross-section of Ontario consumers and LDG proponents.

Members of OAPPA with LDG projects or considering LDG projects will be impacted as changes to standby rates affect the economics of these projects at publicly-funded institutions. OAPPA members without LDG projects have an interest in seeing a sound policy applied to the development and application of standby rates for LDG, promoting rates that reflect the costs imposed and the system benefits provided by LDG.

As mentioned, OAPPA has retained Aegent Energy Advisors. Aegent is an independent consulting firm providing objective advice to electricity and natural gas consumers. Aegent has represented OAPPA in regulatory proceedings at the Ontario Energy Board for a number of years. On behalf of OAPPA, Aegent contributed to Ontario Energy Board File Number EB-2007-0630, Consultation on Distributed Generation: Rates and Connection. Aegent's submission spoke to the allocation of costs to LDG customers, setting and

designing standby rates, standby rate structure, identification of distribution and transmission system benefits from LDG, and distribution of system benefits.

Nominee for Participation in the LDGWWG

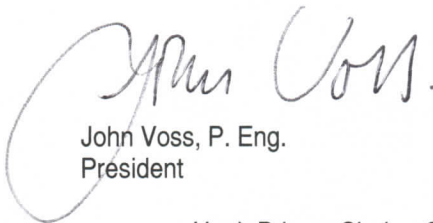
OAPPA is nominating Mike Risavy, a Consultant at Aegent, to represent OAPPA's interests on the LDGWWG. Mike Risavy has advised Aegent clients on the operational characteristics, existing rate treatment, and regulatory framework pertaining to LDG. Prior to rejoining Aegent Mike worked in the Electricity Resources and Power System Planning Divisions of the Ontario Power Authority (OPA) where he evaluated the avoided costs of LDG, forecasting the positive and negative system impacts of LDG over a 20-year period. Mike assessed the role of LDG in meeting customers' electricity demand, forecasted avoided costs from an LDG customer perspective, and evaluated the ratepayer impact of LDG projects while negotiating power purchase agreements between the OPA and LDG counterparties. Understanding the issues from an LDG customer and broader power system perspective, Mike is familiar with the total resource cost test, the OEB's Cost Allocation Model, and the regulatory and legislative framework for LDG in Ontario. Mike holds a Bachelor of Applied Science degree in Electrical Engineering as well as a Bachelor of Science in Computing Technology. Mike has completed professional development or post-graduate courses in combined cycle plant operation fundamentals, electricity market mechanics, financial analysis, project management and negotiation tactics. As appropriate, Mike will draw on the experience of Aegent's Director of Electricity, Bruce Sharp and its Director of Research and Analysis, Val Young during this consultation.

Request for Cost Award Eligibility

OAPPA is requesting that it be found eligible for a cost award in relation to this consultation process including participation on the LDGWWG, if selected. With respect to the cost eligibility criteria set out in section 3.03 of the Board's Practice Direction on Cost Awards and in particular criterion (a), OAPPA is a not-for-profit association representing the direct interests of certain ratepayers in relation to services that are regulated by the Board. In past proceedings, OAPPA has been determined to be eligible for cost awards.

OAPPA looks forward to your response to this nomination letter. If you have questions or require additional information, please contact me at 416-622-9449, X102 or Mike Risavy at 416-622-9449, X111.

Yours truly,



John Voss, P. Eng.
President

cc. Hugh Briggs, Chair – OAPPA Energy Committee / Director – Physical Plant, Lakehead University
Mike Risavy, Consultant, Aegent