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February 22, 2013

BY EMAIL & COURIER

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge St, Suite 2701
Toronto ON M4P 1E4

Dear Ms. Walli:

Board File No. EB-2013-0029

**Application to Review Market Rule Amendments Renewable Energy Supply Generators
Energy Probe – Interrogatories to Applicant**

Pursuant to Procedural Order No. 3 issued by the Board on February 12, 2013, please find attached the Interrogatories of Energy Probe Research Foundation (Energy Probe) to the Renewable Energy Supply Generators in the EB-2013-0029 proceeding.

Should you require additional information, please do not hesitate to contact me.

Yours truly,

David S. MacIntosh
Case Manager

cc: George Vegh, McCarthy Tétrault LLP (By email)
Fred Cass, Aird & Berlis LLP (By email)
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IN THE MATTER OF *the Ontario Energy Board Act, 1998*,
S.O.1998, c.15 (Sched. A);

AND IN THE MATTER OF an Application made collectively
by entities that have renewable energy supply procurement
contracts with the Ontario Power Authority in respect of wind
generation facilities for an Order revoking certain amendments
to the market rules and referring the amendments back to the
Independent Electricity System Operator for further
consideration.

ENERGY PROBE RESEARCH FOUNDATION
INTERROGATORIES TO THE
RENEWABLE ENERGY SUPPLY GENERATORS

February 22, 2013

Energy Probe Interrogatories
to the
Renewable Energy Supply Generators (RESG)

Energy Probe IR #1

Ref: RESG Application Dated January 11, 2013 Paragraphs 5 and 8 & Hearing Transcript Vol.1 February 11, 2013 Pages 8-10.

- a) Please expand the description in the Application paragraph 5 and Hearing Transcript to provide more detail on the impacts of each of the proposed Amendments on RESG members.**
- b) Please provide the complete assumptions and calculations supporting the \$100 million negative impact cited in Paragraph 8.**
- c) Clarify what level of compensation RESG is seeking and provide details of the basis of this amount.**

Energy Probe IR #2

Ref: RESG Letter dated February 5, 2013 re production of Materials Paragraphs 15 and 20

Preamble: The referenced letter at paragraph 15 cites two of the objects of the Electricity Act. The Application cites in addition, “to facilitate the maintenance of a financially viable electricity industry (EA, ss.1(i))”.

- a) Does RESG still base its Application on the latter object? Please explain.**
- b) Does RESG agree that other EA objects may be relevant and the Board may/should consider these? If so, list those that RESG thinks may/should be considered relevant.**
- c) Please provide copies of materials- Correspondence etc., in RESG’s (or its members) possession, that address the issue of compensation.**

Energy Probe IR #3

Ref: Electricity Act Section 36(2)

- a) With regard to the Rule Amendment Process, provide more details of RESG's or its members' opposition to the proposed MR amendments at the Committee level, IESO Board level, at OPA and the Ministry.**
- b) Does RESG dispute that the Market Rule Amendment process followed by IESO was in accordance with established practice and precedent?**
- c) Does RESG dispute that the process followed by IESO was open and fair? Please discuss.**
- d) What steps did RESG, or its members, take pursuant to EA Section 36(2) to attempt to resolve the issue(s). Please provide a complete chronology.**