

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 Ontario Power Generation Inc.
seeking approval of the Reliability Must-Run contract entered into with the
Independent Electricity System Operator in relation to OPG's Thunder Bay
Generating Station;

ONTARIO POWER GENERATION INC.

RESPONSE TO SUBMISSIONS REGARDING ADDITIONS TO THE ISSUES LIST

1. Ontario Power Generation Inc. ("OPG") has reviewed the submission made by the Power Workers' Union ("PWU") regarding the Issues List for OPG's application for approval of a Reliability Must-Run ("RMR") Agreement for Thunder Bay Generating Station ("Thunder Bay").
2. OPG does not support the proposal by the PWU to add additional detail to Issues 1 and 3. OPG submits that the additional detail is unnecessary and should not be preferred over the more general language originally proposed by the Board. The Issues List proposed by the Board represents the "state of the art" for these types of applications in OPG's submission and should not be replaced with wording from a much earlier RMR application.
3. The PWU has proposed the addition of an issue, as follows: Should the Board develop an expedited process to deal with an extension of the term of the RMR agreement for Thunder Bay GS beyond December 31, 2013?
4. OPG does not support the addition of this issue on the basis that it has the potential to delay this proceeding without a clear benefit to the parties to the agreement, to the Board or to

intervenors. That is because it is unclear at this point whether another RMR Agreement for Thunder Bay GS will be required.

5. Assuming IESO market conditions do not change, OPG would expect to file another de-registration request for Thunder Bay GS later this year. Under the Market Rules, the IESO, in response to this request, would have to determine whether it will need to prepare a technical assessment of the impact of the removal from service of Thunder Bay GS on the reliability of the IESO-controlled grid, and if so, prepare an assessment using information that is available at that time. Only then will it be known whether or not a second agreement is required.
6. Accordingly, OPG submits that the better approach would be for the Board, if it believes that an expedited process is necessary, to direct OPG and the IESO to consider and propose an expedited process to deal with RMR Agreements in the next RMR Application filed with the Board. If there is another RMR Application, this would give the parties sufficient time to develop a proposal for the Board's consideration without delaying this proceeding. If there is not another RMR Application then the issue would be moot.

All of which is respectfully submitted,

[Original signed by]

Andrew Barrett

Vice President, Regulatory Affairs

Date: _____