

## THE BOARD OF DIRECTORS

President, PATRICIA ADAMS MAX ALLEN Producer, IDEAS, CBC Radio ANDREW COYNE Columnist, National Post GLENN FOX IAN GRAY President, St. Lawrence Starch Co. CLIFFORD ORWIN Professor of Political Science, University of Toronto

Chair, GAIL REGAN President, Cara Holdings Ltd. Secretary/Treasurer, ANNETTA TURNER ANDREW ROMAN Barrister & Solicitor, Miller Thomson ANDREW STARK Rotman School of Management, University of Toronto GEORGE TOMKO Professor of Economics, University of Guelph Resident Expert, PSI Initiative, University of Toronto MICHAEL TREBILCOCK Chair, Law & Economics, University of Toronto MARGARET WENTE Columnist, The Globe and Mail

May 27, 2013

BY EMAIL ONLY

**Mr. Andrew Barrett** Vice President, Regulatory Affairs **Ontario Power Generation Inc. 700 University Avenue** Toronto ON M5G 1X6

Dear Sir,

Board File No. EB-2013-0061 --- Ontario Power Generation Inc. **Reliability Must-Run Agreement for the Thunder Bay Generating Station Energy Probe – Information Request to Ontario Power Generation** 

Procedural Order No. 2, issued May 21, 2013, provided for written submissions by the parties in respect of the issues in this proceeding to be filed on or before June 7, 2013.

Energy Probe Research Foundation (Energy Probe) filed Interrogatories in this proceeding to Ontario Power Generation (OPG) and received responses on May 13, 2013. While the Board did not provide for a second round of interrogatories, Energy Probe finds itself in the position that it requires additional information from OPG to clarify its response to Energy Probe Interrogatory 3-Energy Probe-1 b):

What is (are) the time period(s) used to distinguish each cost or cost category in Table 1 as avoidable rather than unavoidable?

The response from OPG does not provide this information. Instead, OPG indicates that "if a cost was deemed reasonably avoidable within a period of one or two years following the shutdown of the plant then it was considered variable and recovery was included in the contract."

Energy Probe has difficulty understanding this reply, as its interrogatory did not seek clarification of OPG's understanding of the test. Rather, Energy Probe simply requested the specific time period used to classify each of the 10 costs in Table 1 as avoidable.

Energy Probe Research Foundation 225 BRUNSWICK AVE., TORONTO, ONTARIO M5S 2M6

Accordingly, Energy Probe requests that OPG provide the ten time periods used for the ten cost items in Table 1.

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

Yours truly,

Dwill the thit

David S. MacIntosh Case Manager

cc. Carlton Mathais, Ontario Power Generation Inc. (By email) Fred Cass, Aird & Berlis LLP (By email) Tam Wagner, Independent Electricity System Operator (By email) Norm Rubin, Senior Consultant to Energy Probe (By email) Lawrence Schwartz, Economic Consultant to Energy Probe (By email) Parties of Interest (By email)

## Energy Probe Research Foundation 225 BRUNSWICK AVE., TORONTO, ONTARIO M5S 2M6