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**APPRO**

ASSOCIATION OF  
POWER PRODUCERS  
OF ONTARIO

June 14, 2013

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
27<sup>th</sup> Floor  
2300 Yonge St  
Toronto, ON  
M4P 1E4

**Re: Proposed amendments to OPA license conditions related to Regional Planning**  
**Board File No. EB-2013-0192**

Dear Ms Walli,

Further to the Board's notice of June 3 2013 regarding its proposal to amend the license of the Ontario Power Authority, we are writing to request intervenor status in the above noted proceeding.

### **Representation and Experts**

APPRO proposes to retain an expert to assist in preparing its submission in this proceeding. Rob Cary, who has advised APPRO in the related Working Group, is our recommended expert.

Although the amount of expert time required by APPRO to participate in this proceeding is likely to be small, to the extent that cost eligibility is available, we are requesting cost eligibility for our expert in this proceeding. Alternatively, if it is possible to claim costs for expert time on this proceeding under the Board's Regional Infrastructure Planning consultation initiative, for which APPRO has already been found eligible for costs related to the services of Mr. Cary, such an approach would be preferable.

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### ***Practice Direction and other Funding***

*In accordance with Section 3 of the Board's Practice Direction on Cost Awards, APPrO believes that it is eligible for an award of costs as it represents potentially affected customers as well as a public interest relative to the Board's mandate (s.3.03(b)). As a result, APPrO submits that special circumstances exist to find that it is eligible for a cost award in this process despite the fact that certain of its members may fall within s.3.05(b) of the Practice Direction.*

APPrO is a non-profit organization representing electricity generators in Ontario. APPrO members produce nearly all the power generated in Ontario from facilities of many types including gas-fired, hydro-electric, nuclear and wind energy. APPrO members are customers of transmission and distribution utilities in Ontario, and many have current transmission or distribution connection applications in development or underway. APPrO members often experience challenges associated with the uncertainties and implementation of current rules and policies related to infrastructure planning which may be affected by the license conditions of the Ontario Power Authority.

Depending on the circumstances, the approach taken to regional infrastructure planning could have a significant impact on APPrO members' generation companies and generation facilities, both those in operation and those under development.

APPrO and its members therefore have a significant interest in this proceeding.

On the basis of the foregoing, APPrO respectfully requests that the Board approve its request to intervene in the proceeding, the use of our nominated expert representative, and the related cost eligibility.

Sincerely,



Jake Brooks  
Executive Director

cc: Chris Cincar  
Dave Butters