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February 11, 2014

BY FAX & BY 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-2013-0321 --- Ontario Power Generation Inc.
2014 – 2015 Payment Amounts
Energy Probe – Surreply on Draft Issues List**

Pursuant to Procedural Order No. 2, issued by the Board on February 7, 2014 in respect of Ontario Power Generation Inc., please find attached the surreply of Energy Probe Research Foundation (Energy Probe) in respect of the Draft Issues List in the EB-2013-0321 proceeding for the Board's consideration.

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

Yours truly,

David S. MacIntosh
Case Manager

cc. Colin Anderson, Ontario Power Generation Inc. (By email)
Carlton D. Mathias, Ontario Power Generation Inc. (By email)
Charles Keizer, Torys LLP (By email)
Norm Rubin, Senior Consultant to Energy Probe (By email)
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February 11, 2014

IN THE MATTER OF the *Ontario Energy Board Act*,
1998, S.O. 1998, c. 15, (Schedule B);

AND IN THE MATTER OF an application by Ontario
Power Generation Inc. pursuant to section 78.1 of the
Ontario Energy Board Act, 1998 for an Order or Orders
determining payment amounts for the output of certain of its
generating facilities.

**WRITTEN SURREPLY OF
ENERGY PROBE RESEARCH FOUNDATION
RE: DRAFT ISSUES LIST**

ENERGY PROBE SURREPLY TO OPG:

Energy Probe has reviewed OPG's submissions and makes the following
submissions in surreply:

On January 24, 2014, Energy Probe submitted its comments on the Draft Issues List.
Its only submission was that Issue 3.3 be broadened and re-stated as: "Are the
terms and conditions of OPG's long-term and short-term debt appropriate?"

In its Written Reply Submission dated January 31, 2014, OPG opposed this
modification because

1. To the extent that Energy Probe's concerns were matters relating to costs of
debt, they could be addressed without changing Issue 3.3, and
2. Examining Energy Probe's concerns independent of their cost consequences
would be beyond the scope of an OEB review of OPG's payment amounts.

Energy Probe submits that its concerns are valid matters for examination. OPG itself
raised the underlying issues in its Application. If OPG regards the current review as
relating only to the costs of its debt, then why did it insert those underlying issues in
its Application in the first place?

Energy Probe also points out that in its own submissions on the Draft Issues List,
OPG's first general principle is that "Issues Should be Broadly Defined and Material".

Energy Probe urges that Issue 3.3 be broadened as it has proposed and that it be allowed
to examine the statements by OPG in its Application.

All of which is respectfully submitted.