25 Adelaide Street East, Suite 1602 Toronto, ON M5C 3A1 Canada

416.322.6549 F. 416.481.5785 www.appro.org appro@appro.org

April 28, 2014

Ms. Kirsten Walli Board Secretary Ontario Energy Board 2300 Yonge Street, Suite 2700 Toronto, ON M4P 1E4



Re: EB-2014-0134 Consultation Process for a New DSM Framework

Dear Ms. Walli

In a letter, dated April 10, 2014, the Board announced a consultation process by which the Board intends to develop a new Demand Side Management (DSM) framework for the period 2015 to 2020. The Association of Power Producers of Ontario (APPrO) intends to participate in the consultation process being conducted by the Board.

In accordance with s. 3.03(a) of the Board's Practice Direction on Cost Awards APPrO also intends to seek an award of costs. APPrO represents the direct interests of some of the largest consumers of natural gas in the Province hence any outcomes from a new DSM framework could have a material impact on the rates and services for such customers. Unlike all other large volume customers in Ontario, APPrO members' primary use for natural gas is to generate electricity utilizing large scale industrial gas turbines. No other intervenor represents these large volume customers and therefore no other intervenor can reasonably provide the Board the perspective of these natural gas consumers. Similarly other large volume customers' interests are different than APPrO's members' interests and therefore it is not reasonable to combine the interests of all large volume customers into a common intervention. APPrO has been awarded costs in other proceedings and has participated responsibility.

APPrO's members are large natural gas-fired generators situated all across Ontario in the franchise areas of Enbridge, Union North and Union South. There is over 9,000 MW of large scale gas-fired generation currently installed in Ontario at 30 locations. In addition there is an additional 1,200 MW of additional gas fired generation under development at 2 new locations.

## All correspondence and communication should be directed to:

APPrO 25 Adelaide St. East

Suite 1602

Toronto, ON M5C 3A1

Attention: David Butters, President Telephone: 416-322-6549, x231

Facsimile: 416-481-5785

Email: david.butters@appro.org

## AND

Elenchus Research Associates Inc.

34 King Street East Toronto, ON, M5C 2X8 Attention: John Wolnik Telephone: 519-474-0844

Facsimile: 416 348-9930 E-mail: jwolnik@elenchus.ca

Sincerely,

David Butters
President & CEO