

Ms. Kirsten Walli
OEB Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, Suite 2700
Toronto, ON, M4P 1E4
(via email only)

Re: Gas Distributor Gas Supply Planning Consultation EB-2015-0238

October 27, 2015

Dear Ms. Walli

We are advisors to the Association of Power Producers of Ontario (APPrO) and they have asked us to submit this letter on their behalf.

Pursuant to the Board's letter of direction for the above noted proceeding, dated October 16, 2015, APPrO is notifying the Board that it intends to request an award of eligible costs at the conclusion of this proceeding. APPrO intends to actively participate at the consultation on November 25, 2015 and further intends to make written submissions. APPrO has separately registered to attend this proceeding on November 25, 2015.

The grounds for APPrO requesting an award of costs includes:

1. APPrO is a non-profit organization representing more than 100 companies involved in the generation of electricity in Ontario, including generators and suppliers of services, equipment and consulting services. APPrO members produce power from natural gas, as well as hydro, gas, nuclear, wind, waste wood and other sources.
2. APPrO's members are gas-fired generators in Enbridge's and Union's franchise area. These generators are large volume natural gas customers of the distributors.
3. While most of APPrO's members arrange their own supply and do not purchase significant quantities of gas directly from the distributors, they are directly and materially affected by the distributors' policies with respect to the gas supply practices. In recent years, each of the distributors either has undertaken or is in

the process of developing very significant infrastructure expansions to accommodate a shift to purchase gas supplies at or upstream of Dawn. These large expansions have caused increases in distributor rates paid for by all parties including gas-fired-generators. The shift of these volumes has also resulted in substantially less volume being shipped from Western Canada on the TransCanada Mainline which in turn has also caused the tolls on the Mainline to increase, including those tolls used by gas-fired-generators. The way that the distributors purchase their gas supply can have an effect on the price of gas in Ontario which will affect all of consumers of gas, whether they are system sales customers or not. Even though gas-fired-generators do not purchase their supplies from the distributors, distributor supply strategies can have a direct financial consequence on gas-fired generators.

SCOPE OF PARTICIPATION:

4. APPrO intends to attend the November 25, 2015 presentations. APPrO does not intend to make a presentation on November 25, but does intend to make final submissions by December 10, 2015.

APPrO's EXPERIENCE AS A FREQUENT INTERVENOR:

5. APPrO has a record of participating in Board proceedings as an intervenor. Recent examples of applications include: EB-2012-0459, EB-2014-0182, EB-2014-0261, and EB-2015-0200. As required by Rule 22.04 of the Board's Rules of Practice and Procedure and Rule 3.03.1 of the Board's Practice Direction on Cost Awards, APPrO filed with the Board information on APPrO's mandate, objectives, membership, constituency, programs and activities and other relevant information within the previous 12 month period as part of these referenced proceedings in which it has participated. This document has been updated and attached as Attachment 1 to this Notice of Intervention.

COSTS:

6. Pursuant to s. 3.06 of the Board's Practice Direction on Cost Awards, APPrO intends to seek an award of costs from Enbridge. In accordance with s. 3.03(a) of the Board's Practice Direction on Cost Awards, APPrO represents the direct interests of consumers in relation to Enbridge's regulated services (APPrO's members are the largest consumers of Enbridge's services).
7. APPrO has a record of participating in Board proceedings in a responsible and

efficient manner and the Board determined that APPrO was eligible for cost awards in other proceedings, including Union and Enbridge annual rates cases; various facility applications, and several natural gas proceedings that had unique impacts on power generators (including, among others, NGEIR and storage allocation proceedings). APPrO believes it is appropriate for the Board to do so again in the context of this proceeding.

COUNSEL/REPRESENTATIVES

8. APPrO will be represented by the following parties and requests that the Board and all other parties provide copies of all presentations and correspondence related to this proceeding, to the contact information below.

APPrO:

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Sincerely



John Wolnik

**CC David Butters (APPrO)
Jason Craig (Board Staff)**

Attachment 1

The Association of Power Producers of Ontario

Description

The Association of Power Producers of Ontario ("APPrO") is a non-profit trade and professional organization representing more than 100 companies involved in the generation of electricity in Ontario, including generators and suppliers of services, equipment and consulting services. APPrO is the largest organization of its type in Canada. APPrO was established in 1986 as the Independent Power Producers' Society of Ontario and changed its name to APPrO in 2003.

Mandate and objectives

APPrO's principal objective is the achievement of an economically and environmentally sustainable electricity sector in Ontario that supports the business interests of electricity generators. APPrO's role in the electricity sector is to raise awareness and understanding of its members' concerns with senior decision-makers in government, regulatory bodies and the public at large.

Membership and representative constituency

APPrO currently has about 100 corporate members, who collectively produce more than 95% of the electricity made in Ontario. APPrO's members produce electricity from a range of sources, including natural gas, hydroelectricity, cogeneration, windpower, solar energy, biomass, biogas, nuclear energy, and other sources. The total value of assets owned or operated by APPrO members is estimated at more than C\$50 billion, and the total annual sales of electricity by APPrO members exceeds C\$7 billion per year (wholesale value).

Programs and activities

APPrO acts as an advocate for its members. It aims to have a voice on regulatory and policy issues which affect generators in Ontario, including electricity market rules, power procurement processes, the regulation of the natural gas market (both provincially and federally), climate change rules and compliance mechanisms, approval requirements, transmission development, distributed generation, and a number of other issues. APPrO is a leading advocate for public policies and regulatory treatments that it believes will facilitate the development of power generation in the province and assist in the development of a more open and competitive market for power.

APPrO also organizes industry conferences and produces a number of publications. APPrO's magazine, IPPSO FACTO, is an authoritative periodical on the electricity business and policy issues in Canada.