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June 21, 2016

VIA RESS, EMAIL AND COURIER

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
Suite 2700
P.O. Box 2319
Toronto ON M4P 1E4

Dear Ms. Walli:

Re: Letter of Comment in EB-2015-0363

We are counsel to Invenergy LLC, which operates the 584 MW natural gas-fired St. Clair Energy Centre near St. Clair, Ontario. We are writing to provide comments on the Ontario Energy Board's ("OEB") Staff Discussion Paper on a Cap and Trade Regulatory Framework for Natural Gas Utilities- EB-2015-0363. In particular, on page 33 of the Staff Discussion Paper, the OEB states the following:

"...the per-cubic meter charge for facility-related obligation costs should be included in the delivery charge on the customer's bill. Staff also sees the merit of including the administrative costs in the delivery charge as both of these costs will be a cost of doing business."

Invenergy supports the cap and trade volumetric charge being displayed as a separate line item on the utility bill and not as part of the delivery charge. A separate line item provides billing transparency, clarity and supports the policy of sending a price signal to consumers of natural gas regarding the costs of greenhouse gas emissions. Further, from an administrative perspective, a separate line item would facilitate tracking the costs of cap and trade and making such costs readily available and ascertainable to third parties, such as, for example, lenders.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "George Vegh".

George Vegh

c. Brett Scheland, Invenergy LLC