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APPrO
ASSOCIATION OF
POWER PRODUCERS
OF ONTARIO

August 15, 2016

VIA RESS AND COURIER

Ms. Kirsten Walli
ONTARIO ENERGY BOARD
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, Ontario
M4P 1E4

Dear Ms. Walli:

Re: IGUA Request for Further Information and Reasons on the Ontario Energy Board's "Early Determination regarding Billing of Cap and Trade Related Costs and Customer Outreach (July 28, 2016)" in relation to EB-2015-0363: Cap and Trade Framework for Natural Gas Utilities.

APPrO is in receipt of the above captioned letter from IGUA.

Like virtually all other participants in this consultation APPrO strongly advocated for transparency around carbon pricing in relation to utility invoices. We were puzzled and disappointed by the Board's July 28th "Early Determination" on this point.

In our June 21st submission we noted that there "...must be transparency on the costs of carbon on customer's invoice. Full disclosure of the carbon costs is required to properly evaluate plant improvements to reduce greenhouse gas emissions and to settle contractual requirements with the IESO and OEFC. APPrO recommends therefore that compliance costs be included as a specific line item in utility tariffs and on customer bills..."

APPrO remains of the same view. Further, as noted by IGUA, the billing determination is a marked departure from a longstanding policy of bill disaggregation.

APPrO therefore fully supports IGUA's request that:

- a) the Board provide the reasons in support of its Determination that carbon compliance costs should be blended rather than separately identified on customer bills; and
- b) the Board provide further details regarding the information on cap and trade that the Board envisions requiring the utilities to include on monthly customer bills.

Sincerely,

A handwritten signature in black ink, consisting of a large, loopy initial 'D' followed by a series of connected loops and a trailing line that ends in a small dot.

David Butters
President & CEO