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November 9, 2016
Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto ON M4P 1E4

Dear Ms. Walli:

**Re: Ontario Power Generation Inc. 2017-2021 Payment Amounts, EB-2016-0152,
Issues Prioritization**

Energy Probe Research Foundation ("Energy Probe") agrees with many of the proposals of Board Staff ("Staff") in regards to the prioritization of issues. We wish to make a few additional comments, particularly to the suggestions of Ontario Power Generation (OPG) on the matter.

We believe these issues, as suggested by OPG, should not be secondary:

- Issue 9.1-9.5 (Deferral and Variance accounts): We believe its premature to designate the issue of OPG's deferral accounts as of secondary concern until after the technical conference. Due to the length of this application (five years) and the amount of money that may potentially flow through deferral accounts, we think it's necessary to reserve judgment on the importance of this issue until more is known.
- Issue 10.4: The Darlington Refurbishment Program (DRP) is one of OPG's largest capital expenditures. How the company reports on that project is of vital concern to both the public and the Board. We believe this may be one of the most important issues in this application.
- Issue 11.5: The mid-term review will provide both the Board and the public with an opportunity to examine OPG's adherence to its five-year application. Given the amount of money at stake, this should be considered a primary issue.
- Issue 11.7: Again, given the billions of dollars at stake in this application, we think it would be helpful to both the Board and the public to understand what kind of off-ramps

Energy Probe Research Foundation 225 BRUNSWICK AVE., TORONTO, ONTARIO M5S 2M6

Phone: (416) 964-9223 Fax: (416) 964-8239 E-mail: EnergyProbe@nextcity.com Internet: ep.probeinternational.org

OPG has considered. We think this would be better done in an oral hearing, rather than written.

Yours truly,

Original signed by

Brady Yauch,
Consultant and Case Manager for Energy Probe

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