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Our File No. 339583-00254

By electronic filing

December 19, 2018

Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
Suite 2701
Toronto ON M4P 1E4

Dear Ms. Walli

**Re: Ontario Power Generation Inc.
Application for 2019 hydroelectric payment amount adjustment and recovery
of deferral and variance account balances
Board File No.: EB-2018-0243**

Pursuant to Procedural Order No. 3 in this proceeding, written submissions regarding the draft issues list found at Schedule "A" of Procedural Order No. 3 shall be filed with the OEB no later than December 19, 2018. Please consider this letter to be the submissions of Canadian Manufacturers & Exporters ("CME") on the issues list.

CME shares the concerns outlined by the other intervenors regarding Ontario Power Generation's ("OPG") proposal to defer consideration of future balances in its deferral and variance accounts until its next rebasing. OPG's deferral and variance account balances are often significant, and as a result, could represent significant additional amounts paid for through rates, and the potential for rate shock or intergenerational inequity.

Accordingly, CME supports the Consumers Council of Canada's proposal to add the following issue to the issues list for this proceeding:

Is OPG's proposal to defer consideration of all future balances in its deferral and variance accounts, including the balances in 2018 accounts and some 2017 accounts, until its next rebasing in 2022 appropriate?

Yours very truly

Borden Ladner Gervais LLP



Scott Pollock

- c. Saba Zadeh and Mel Hogg (OPG)
- Charles Keizer (Torys)
- EB-2018-0243 Intervenors
- Alex Greco (CME)

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