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December 18, 2018

Ms Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
Toronto, ON
M4P 1E4

Dear Ms. Walli,

**RE: EB-2018-0243 Application by Ontario Power Generation Inc.,
Submission of Energy Probe regarding Issues List**

Procedural Order No.3 issued by the OEB on December 13, 2018, states that OPG, OEB staff and intervenors may make submissions on the draft issues list and file any submissions with the OEB and deliver them to all parties no later than December 19, 2018.

Energy Probe supports the proposal by the Consumers Council of Canada that the following issue be added 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?

Energy Probe is concerned that balances in OPG's deferral and variance accounts will result in large intergenerational cross-subsidies if their clearance is delayed until rebasing.

Respectfully submitted on behalf of Energy Probe.

Original signed by

Tom Ladanyi
Consultant to Energy Probe

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