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September 11, 2019

mccarthy tetrault

VIA EMAIL, RESS & COURIER

Ms. Kirsten Walli Board Secretary Ontario Energy Board 2300 Yonge Street, Suite 2700 Toronto, ON M4P 1E4

Re: EB-2019-0002 - APPrO Interrogatories

Dear Ms. Walli:

We are counsel to the Association of Power Producers of Ontario ("APPrO"). Pursuant to Procedural Order no. 6, please find enclosed APPrO's interrogatories in this proceeding.

Yours Truly,

George Vegh

cc: David Butters, President & CEO, APPrO

Parties in EB-2019-0002

ONTARIO ENERGY BOARD

IN THE MATTER OF subsection 25(1) of the *Electricity Act, 1998*

AND IN THE MATTER OF a submission by the Independent Electricity System Operator to the Ontario Energy Board for the review of its proposed expenditure and revenue requirements for the fiscal year 2019 and the fees it proposes to charge during the fiscal year 2019

Interrogatories of the Association of Power Producers of Ontario ("APPrO")

<u>Update on Status of Incremental Capacity Auction</u>

<u>APPrO INTERROGATORY 1</u>

Reference: Exhibit C-2-2, p. 1

The evidence states that the proposed ICA has a lack of stakeholder support to proceed with detailed design and that the IESO stopped further work.

APPrO understands that the IESO is seeking to purchase capacity through a Transitional Capacity Auction ("TCA") starting in 2020.

1. Please advise whether the TCA has more or less stakeholder support than the ICA.

APPrO INTERROGATORY 2

Reference: Exhibit C-2-2, p. 1

The evidence states that the "IESO remains committed to providing open, transparent and competitive mechanisms for acquiring capacity and allowing a variety of resource types to compete."

In light of this commitment to openness, transparency and competitive mechanisms, please confirm that, for the 2020 TCA or subsequent TCA's:

- 1. The IESO will consider the merits of a range of alternative procurement approaches;
- 2. the IESO will undertake a stakeholder engagement process to develop these alternative procurement approaches;

APPrO Interrogatories to IESO Filed: September 11, 2019 EB-2019-0002 Page 2 of 2

3. the stakeholder engagement process will include an independent cost-benefit analysis of all potential procurement approaches, which will include input from stakeholders on how the cost-benefit analysis should be considered in implementing any alternative procurement approach.

If the IESO is not prepared to confirm this, why not?